

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JANE DOE,

Plaintiff,

VS.

THE METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE, AND
DR. ADRIENNE BATTLE,

Defendant.

No. 3:20-CV-01023
Jury Demand
Judge Trauger
Magistrate Judge
Holmes
Lead Case

DR. LILY MORENO LEFFLER,

Plaintiff,

VS.

THE METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE, AND
DR. ADRIENNE BATTLE,

Defendants.

DR. JAMES BAILEY,

DR. PIPPA MERIWETHER and
DR. DAMON CATHEY,

Plaintiffs,

VS.

METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE and
DR. ADRIENNE BATTLE,

Defendants.

DEPOSITION OF ASHFORD HUGHES
Taken on April 11, 2022

<div>Page 2</div> <div>Page</div> <div>1</div> <div>2 -----</div> <div>3 PREPARED BY:</div> <div>4 CRISTI G. WATSON, LCR</div> <div>5 Briggs & Associates</div> <div>6 222 Second Avenue North, Suite 340M</div> <div>7 Nashville, Tennessee 37201</div> <div>8 Cristicr@bellsouth.net</div> <div>9 615-424-0999</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 4</div> <div>Page</div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>Page 3</div> <div>Page</div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 5</div> <div>Page</div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>

<p style="text-align: right;">Page 6 Page</p> <p>1 you hear me now? Let me try another way to get on. 2 One second, please. Are you able to hear me now? 3 MS. STEINER: Yes. 4 Q. Mr. Hughes, I am going to ask you a whole 5 bunch of questions today. Hopefully, it won't be that 6 long. If you don't understand one of my questions, let 7 me know and I will go back and rephrase it for you. 8 Only thing I will stop you for is if you go uh-huh or 9 nod. I will make you say yes or no so the court 10 reporter can take it down and we will have a clear 11 record for trial. Okay? 12 A. Yes, ma'am. 13 Q. Are you married? 14 A. Yes, ma'am. 15 Q. What is your wife's name? 16 A. Her name is Victoria Christiansen Hughes. 17 Q. Where do you live? 18 A. I live at [REDACTED], 19 Circle, Nashville, Tennessee. 20 Q. What is your zip? 21 A. 37214. 22 Q. Do you have any children? 23 A. Yes. 24 Q. How many and what are their ages? 25 A. Two young boys ages three and nine.</p>	<p style="text-align: right;">Page 8 Page</p> <p>1 Q. Did you make the decision to put him 2 there? 3 A. My wife and I made the decision that we 4 would try to get him into Stanford along with several 5 other schools. 6 Q. What were the other schools? 7 A. I do not have that off the top of my head 8 right now. I can ask my wife. 9 Q. Were they Metro schools or private 10 schools? 11 A. Metro schools. 12 Q. To get in to Stanford, did you have to 13 apply to the lottery that you run? 14 A. To get in, yes. At the time I was not in 15 the school right then, but, yes, we did apply through 16 the lottery process. 17 Q. Was Jane Doe running the process then? 18 A. I don't have the answer to that. I am 19 not certain. I am not certain of that answer. 20 Q. When did your child get in Stanford? 21 A. He is in the third grade now. I don't 22 have that correct answer. 2018. 23 Q. Where did he go to grade school? 24 A. He did not -- sorry, repeat the question. 25 Q. Where did he go to first grade?</p>
<p style="text-align: right;">Page 7 Page</p> <p>1 Q. Nine year old -- where does he go to 2 school? 3 A. Stanford Montessori Elementary School. 4 Q. Is that connected to Metro schools? 5 A. It is. It is a public school. 6 Q. To get in Stanford did you have to go 7 through some sort of lottery? 8 A. Yes, ma'am. 9 Q. Tell me is that the lottery that you run? 10 A. I supervised the team that manages the 11 school options process, yes, ma'am. 12 Q. Is Stanford one of the best in Metro? 13 A. Repeat the question. 14 Q. Is Stanford one of the best montessori 15 schools in Metro Nashville? 16 A. Not certain. If I were to quantify is 17 one school better than the other, it is one of two 18 public montessori schools we do have. 19 Q. What is the other one? 20 A. The other montessori that is public is 21 Hull Jackson. 22 Q. Your nine year old -- did you have to 23 apply through the lottery you run to get him in that 24 school? 25 A. Yes, ma'am.</p>	<p style="text-align: right;">Page 9 Page</p> <p>1 A. Stanford Montessori. 2 Q. Where did he go to kindergarten? 3 A. Stanford Montessori. 4 Q. Did he go to pre-kindergarten? 5 A. He did not. 6 Q. When you applied for kindergarten, he 7 applied for the montessori school, correct? 8 A. Yes, ma'am. 9 Q. How many parents applied for that school? 10 A. I don't have that information in front of 11 me to. 12 Q. Is it a fair statement a lot more apply 13 than actually get in? 14 A. Again, I don't have the information in 15 front of me to say yes or no to that. 16 Q. That's what you run now, correct? 17 A. I supervise the team that manages the 18 school options process and implements. 19 Q. You can't tell me today under oath 20 whether or not more parents apply to get their kids in 21 the montessori schools than actually get in? 22 A. I can't. To give you a just answer on 23 that, no, I -- 24 Q. Is it possible you have empty desks and 25 empty seats in the montessori schools then?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Let me make sure I heard that. Is it 2 possible we have empty schools in the montessori 3 schools? 4 Q. Or more places for children than you 5 actually have applications? 6 A. I think I would need to think about that 7 and look at the process. Stanford and all our schools 8 that are choice options have many families seeking to 9 get entry into them, and it is a school by school basis 10 to understand who is getting in, how many applications 11 are going in, particularly since COVID has passed, so I 12 would need to dig deep to give you a specific answer to 13 that that is factual. 14 Q. Seems like to me you would have more 15 parents applying for the better schools than actually 16 could get in, and you are in charge of that, and you 17 are telling me today under oath you don't know, you 18 have no idea about the application numbers? 19 A. Again, I would push back against the 20 premise, and I know I haven't said Stanford is the 21 better school. I would push back on the premise of any 22 school being better than any one school. I don't have 23 that information. 24 We made the decision to send our son 25 where we thought was best for our son, but I cannot</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Do you know what high school he is zoned 2 for? 3 A. I believe again the community we live in 4 I believe is McGavock. 5 Q. Do you know if McGavock is not known as 6 being a good school in terms of preparing the kids for 7 college? 8 A. Again, that's an opinion based question. 9 I can't speak to what some people feel is better school 10 or not better school. 11 Q. So do you know anything about the testing 12 for these schools and how they do empirically with 13 regard to the SATs, the ACTs compared to each other? 14 A. I cannot. I do not have that information 15 off the top of my head. That's not been a school 16 option question we deal with. 17 Q. You and your wife made the decision to 18 put your son in Stanford, as opposed to the grade 19 school that he is zoned for, correct? 20 A. Yes, ma'am. 21 Q. Tell me why. 22 A. We made the decision based off trying to 23 understand what the system was, didn't really 24 understand how to go through the process, and my wife 25 said, hey, these are schools I believe look well to us,</p>
<p style="text-align: right;">Page 11</p> <p>1 provide for you right now the specific numbers as to 2 which schools have more kids going in and which others 3 without looking at the information directly in front of 4 me. 5 Q. Do you know whether or not montessori 6 schools are known for preparing kids better for high 7 school and college than other schools such as Whites 8 Creek? 9 A. I can't speak to that. Every family 10 makes their own decision. 11 Q. So you are in charge of School Choice. 12 You don't know whether or not some of the schools at 13 Metro, such as Whites Creek, Pearl-Cohn versus 14 Hillsboro, Hillwood or montessoris have better scores 15 in general? 16 A. I believe the question that you asked me 17 was around which schools are better. I can't answer 18 that question. I don't often, you know, necessarily 19 when I manage the team -- we don't look at scores of 20 the schools. We have families provide choices in which 21 they know are available for them and help them apply. 22 Q. If your child did not go to the 23 montessori school, what school is he zoned for? 24 A. I would need to look at my information. 25 I can't say off the top of my head.</p>	<p style="text-align: right;">Page 13</p> <p>1 let's try to get him in. I believe that's the process 2 we took. 3 Q. My question was a little different. You 4 said these are schools that look well to you. Why do 5 they look well to you compared to the school he was 6 zoned for? 7 A. I would have to reconnect with my wife. 8 She is the main person in our household, and we try to 9 do this together. I think it was just trying to figure 10 out what the system was. We didn't really understand 11 it, so we looked at the options available to us. I 12 have a nephew that went to montessori school in 13 Knoxville and we thought why not give it a try. 14 Q. You didn't know what the system was; you 15 didn't understand the system when you put your child in 16 that school, correct? 17 A. We did not know how to go through the 18 process of identifying which schools we wanted our kids 19 to go to because we were first time parents going 20 through the process. We asked friends and went in and 21 tried to research ourselves as we were trying to decide 22 which school we wanted to send our child to. 23 Q. Isn't it true you identified the schools 24 you thought would give your child a better education? 25 A. Isn't it true -- repeat the question one</p>

<p style="text-align: right;">Page 14</p> <p>1 more time.</p> <p>2 Q. Isn't it true you and your wife attempted</p> <p>3 to identify the schools that would give your child the</p> <p>4 better education?</p> <p>5 A. I think we wanted to find a school that</p> <p>6 we were comfortable with that we thought would best</p> <p>7 benefit our son, and we tried to figure out what that</p> <p>8 looks like for us being new parents to this. So I</p> <p>9 can't exactly say what our full methodology was, but we</p> <p>10 were learning and we were new, and this was the choice</p> <p>11 we chose or were able to choose.</p> <p>12 Q. Do you know any more about the procedure</p> <p>13 at Metro schools and how to place your child in a Metro</p> <p>14 school today as of today's date?</p> <p>15 A. Do I know more now? (Audio distortion.)</p> <p>16 Q. You went out for a second.</p> <p>17 A. I said, yes, I do know more now.</p> <p>18 Q. How do you know more now?</p> <p>19 A. Because first I manage school options</p> <p>20 team now, and I've had to do research and understand</p> <p>21 that process. I have had to help some families walk</p> <p>22 through that process themselves, so obviously going on</p> <p>23 the time I have been here now supervising that team, I</p> <p>24 have been able to really understand more about the</p> <p>25 process, the system, and everything that goes on.</p>	<p style="text-align: right;">Page 16</p> <p>1 for diversity -- for the Executive Officer for</p> <p>2 Diversity, Equity, and Inclusion.</p> <p>3 Q. How did you know that job position was</p> <p>4 open?</p> <p>5 A. I believe several months before I came on</p> <p>6 as I was transitioning from another job, I was asked</p> <p>7 would I be interested in interviewing for the position.</p> <p>8 Q. Who asked you that?</p> <p>9 A. I believe I had a meeting in mid April,</p> <p>10 early April with Mr. Hank Clay.</p> <p>11 Q. Was that the first you knew that there</p> <p>12 was going to be an opening?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Did he ask you to come in for an</p> <p>15 interview, for a meeting, or was it -- where did the</p> <p>16 meeting take place?</p> <p>17 A. I do not remember off the top. It may</p> <p>18 have been -- I don't want to speculate. I do not</p> <p>19 recall off the top of my head. Might have been a phone</p> <p>20 call, but I was on the road at the time working with</p> <p>21 Michael Bloomberg at the time, so I do not recall where</p> <p>22 it was at specifically as of right now.</p> <p>23 Q. So it was a phone call and you were out</p> <p>24 of town, correct?</p> <p>25 A. I can't say that. I don't remember. I</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Before you took the job as Executive</p> <p>2 Officer of Diversity, Equity and Inclusion, did you</p> <p>3 have any knowledge about how that job was run in terms</p> <p>4 of School Choice?</p> <p>5 A. Let me make sure. Did I have any</p> <p>6 understanding how the job of chief of Diversity,</p> <p>7 Equity, and Inclusion officer was run or the office of</p> <p>8 School Choice?</p> <p>9 Q. Officer of School Choice.</p> <p>10 A. Up until that time I did not.</p> <p>11 Q. Did you know you were going to be given</p> <p>12 School Choice when you were hired on as executive</p> <p>13 officer of diversity, inclusion -- and what was the</p> <p>14 other term?</p> <p>15 A. Diversity, Equity, and Inclusion.</p> <p>16 Q. Did you know you would be given the</p> <p>17 School Choice when you took that job?</p> <p>18 A. At the onset in the first interview I did</p> <p>19 not know.</p> <p>20 Q. When you went in to interview for the</p> <p>21 School Choice job, how did you know there was going to</p> <p>22 be an opening?</p> <p>23 A. I fall back on the premise I did not take</p> <p>24 an interview for specifically the School Choice. I</p> <p>25 took an interview to apply for -- to come for the job</p>	<p style="text-align: right;">Page 17</p> <p>1 don't recall right now where we met, if we met in</p> <p>2 person or not right now. It's been some time ago.</p> <p>3 Q. Why did you have this contact with Hank</p> <p>4 Clay?</p> <p>5 A. As I said he asked what was I working on</p> <p>6 right now, would I be interested in applying for the</p> <p>7 position that might be upcoming.</p> <p>8 Q. What did you tell him?</p> <p>9 A. If I recall, I told him what I was</p> <p>10 working on right then and that I would be interested.</p> <p>11 Q. What did you tell him you were working on</p> <p>12 right then?</p> <p>13 A. Just with Michael Bloomberg at the time.</p> <p>14 Q. What did you tell him about Michael</p> <p>15 Bloomberg?</p> <p>16 A. I don't recall.</p> <p>17 Q. Did he ask you any questions about your</p> <p>18 background?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. In that phone call?</p> <p>21 A. Again, I hate to speculate if it was a</p> <p>22 phone call. I just don't remember the term of</p> <p>23 communication at this time.</p> <p>24 Q. How long did you speak with Mr. Clay in</p> <p>25 this mid-April 2020 meeting?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. I don't recall. Most of the time -- I 2 can't give you an honest number, timeline right now. 3 Q. What did you do for Michael Bloomberg? 4 A. For several months I served within his 5 team within our state team. We did some national work 6 around DE&I space cultivating leadership within black 7 and brown communities and doing a lot of political 8 organizing across the state and in some of the southern 9 areas. 10 Q. Were you paid for that job? 11 A. Yes, ma'am. 12 Q. What were you paid? 13 A. I would have to go through my tax records 14 to say what the full contract was. 15 Q. I want to know approximate. 16 A. Okay. Again, it's been a while. I don't 17 have the full approximate. I would have to go back and 18 look through my contract I had with them. 19 Q. Was it a part-time job or full-time job? 20 A. It was my full-time. It was full-time 21 contractual. 22 Q. And how many hours a week did you work 23 for Bloomberg and when did you start working for 24 Bloomberg? 25 A. I believe I started working for Bloomberg</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Could it have been a thousand dollars an 2 hour? 3 A. I can't give you an honest answer without 4 looking at my records to assess. 5 Q. Could it have been 2000 an hour? 6 A. Again, I would have to look at my 7 records. It's been almost two-plus years. I would 8 need to look at the records to see what that contract 9 was with the Bloomberg team. 10 Q. Did you work anyplace else from October 11 2019 until you went to work for Metro schools? 12 A. I cannot say that I did. 13 Q. You can answer anything as long as it's 14 truthful. 15 A. Exactly. I cannot say that I did work 16 for anybody in between that time that I was on a paid 17 contract for. 18 Q. Who did you work for? 19 A. As I said earlier, Michael Bloomberg. 20 Q. Anybody else? 21 A. I cannot recall right now anybody else 22 that I would have worked for in between the time that I 23 was under contract for. 24 Q. Did you know Hank Clay before you came in 25 for the interview?</p>
<p style="text-align: right;">Page 19</p> <p>1 November or October of 2019, and I can't recall exactly 2 how many hours a week I was working. I would have to 3 again look at my contract. I believe it might have 4 been 30 or 40 hours a week, but I had a contract with 5 them I was working. I would have to go back and look 6 for that information. 7 Q. Paid by salary or hourly? 8 A. I was paid via contract. 9 Q. Was it an hourly rate or a salary rate? 10 A. It was an hourly rate. 11 Q. What was your hourly rate? 12 A. Again, I need to go back and look at the 13 contract. I can't recall. 14 Q. Was it \$500 an hour? Was it \$100 an 15 hour? Was it \$20 an hour? Do you have any idea? 16 A. I just don't remember. 17 Q. You don't know if it was \$500 an hour or 18 \$15 an hour? 19 A. I don't, ma'am. I would need to look at 20 my records just to verify to give you an honest 21 assessment. 22 Q. You possibly could have made \$500 an hour 23 working for Mr. Bloomberg? 24 A. I can't give you an honest assessment on 25 that to answer the question the way you asked it.</p>	<p style="text-align: right;">Page 21</p> <p>1 A. I did. 2 Q. How did you know him? 3 A. I have known him for -- in years past 4 through mutual friends, through political politics. 5 Q. You knew him politically, correct? 6 A. Yes. 7 Q. You are both members of the democratic 8 party? 9 A. Yes, I am. I am a member of the 10 democratic party. I cannot speak to what Hank Clay is 11 a member of at this time. 12 Q. Did you know that he is a democrat? 13 A. When we met I believe we met in 14 democratic circles, but, again, I am speaking -- you 15 asked me a question. I am speaking to what Ashford is 16 100 percent aware of. I can't say Hank Clay is still 17 with the democratic party. I don't know. We met years 18 ago in democratic political circles. 19 Q. When you were hired to work for Metro 20 schools as an executive officer, was Hank Clay still 21 actively involved in the democratic party? 22 A. I can't answer that question. That would 23 be a question Hank Clay would have to answer. 24 Q. You don't know that? 25 A. I do not know. I cannot speak to Hank</p>

<p style="text-align: right;">Page 22</p> <p>1 Clay what he is part of outside of the professional 2 realm.</p> <p>3 Q. How many interviews did you have for the 4 job?</p> <p>5 A. Off the top of my head, I am thinking I 6 would need to go back through my calendar. At least 7 three interviews.</p> <p>8 Q. Who were they with?</p> <p>9 A. I know the chief of HR at the time, the 10 chief of schools of innovation at the time. There were 11 I believe a couple of other people, but I can't recite 12 who all those individuals were at this time. I know 13 those stuck out.</p> <p>14 Q. Who was the chief of HR?</p> <p>15 A. Mr. Chris Barnes.</p> <p>16 Q. Who was the chief of schools innovations?</p> <p>17 A. Dr. Sharon Griffin.</p> <p>18 Q. Do you recall interviewing with Hank 19 Clay?</p> <p>20 A. Yes. He was on (audio distortion) -- I'm 21 sorry.</p> <p>22 Q. Do you recall interviewing with Hank 23 Clay?</p> <p>24 A. Yes. He was on a couple of the latter 25 end interviews I did.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I believe, as I said in my earlier 2 testimony, the first interview that I had with -- I 3 don't believe -- I can't recall off the top of my head 4 if Hank was there. I know those two individuals and 5 two others. I know in the latter interviews Mr. Clay 6 was a part of the interview process.</p> <p>7 Q. Now, it sounds like you had several 8 interviews that started out solely with Chris Barnes, 9 Sharon Griffin to begin with and then turned into a 10 group interview with all three, Griffin, Barnes and 11 Clay? Is that what you are saying?</p> <p>12 A. I believe -- as I said earlier, there 13 were multiple besides Mr. Barnes and Ms. Griffin on my 14 very first interview I believe, and then leading up to 15 the final interviews it was -- I don't recall if it was 16 at the end one person or two people on there. I would 17 need to go back and look at my calendar to verify. 18 There has been a lot since then that's taken place. I 19 can't specifically give you minute details of the who, 20 when, and where for all of those details.</p> <p>21 Q. Do you know if anyone else who applied 22 for that job was interviewed by a panel other than you?</p> <p>23 A. I don't know. I can't speak to that. 24 I can't speak to their methodology.</p> <p>25 Q. Did you know Hank Clay testified he was</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. You got me a little confused because Hank 2 Clay said he is the only one that interviewed you.</p> <p>3 A. Hum.</p> <p>4 Q. You are saying you literally went in for 5 an interview with Chris Barnes, you went in for Sharon 6 Griffin?</p> <p>7 A. I did not. I remember the interviews I 8 had before. Scope of interviews I had included those 9 individuals.</p> <p>10 Q. So when you came in to interview for 11 Metro schools, you had an interview with Chris Barnes, 12 an interview with Sharon Griffin, and an interview with 13 Hank Clay?</p> <p>14 A. No. What I am telling you is that over a 15 period of time I had an interview with a panel of 16 people, Chris Barnes, Dr. Sharon Griffin, and I think 17 there were maybe two other people on there. I don't 18 remember those faces or those names right now, but it 19 was a panel that I went through.</p> <p>20 Q. Did you interview solely with Hank Clay?</p> <p>21 A. I don't believe so. I can't recall off 22 the top of my head.</p> <p>23 Q. You went to a panel interview that had -- 24 correct me if I am wrong -- Chris Barnes, Sharon 25 Griffin, Hank Clay on the panel?</p>	<p style="text-align: right;">Page 25</p> <p>1 the only one to interview you?</p> <p>2 A. I can't speak to that.</p> <p>3 Q. I want to talk about how the interview 4 occurred. Was it live or by Zoom or telephone or some 5 other method?</p> <p>6 A. By Zoom.</p> <p>7 Q. So do you know if it was recorded?</p> <p>8 A. I can't remember.</p> <p>9 Q. Do you know the date of your first 10 interview?</p> <p>11 A. I can't remember.</p> <p>12 Q. Do you know the date of your second 13 interview and how it was done?</p> <p>14 A. Again, I don't remember off the top of my 15 head. It was something I would have to dig deep into 16 my calendar to find.</p> <p>17 Q. Do you know the date of your third 18 interview?</p> <p>19 A. I do not have that in front of me, no, 20 ma'am.</p> <p>21 Q. Under oath today isn't it true you really 22 weren't interviewed?</p> <p>23 A. I would definitely push back against that 24 and say that is absolutely false. I was interviewed, 25 multiple interviews.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. Did you fill out an application?</p> <p>2 A. Absolutely.</p> <p>3 Q. Was it filled out on line?</p> <p>4 A. The application was filled out on line.</p> <p>5 Q. Did Mr. Clay tell you why he wanted you</p> <p>6 to apply for this position?</p> <p>7 A. He did not that I recall.</p> <p>8 Q. I am going to share a screen with you</p> <p>9 hopefully. Can you see this screen?</p> <p>10 A. I can.</p> <p>11 Q. Good. Let's go up to the top and go</p> <p>12 through this and ask if you recognize this. This was</p> <p>13 produced to me by Metro schools. You see at the bottom</p> <p>14 of the page where it says MG000183?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. I want to ask you questions about this.</p> <p>17 Says at the top Ashford R. Hughes applied for job of</p> <p>18 Executive Officer of Diversity, Equity, and Inclusion,</p> <p>19 correct?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Let's go down to the very bottom. These</p> <p>22 are all numbered in line, and the last one is MG000202,</p> <p>23 correct?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Does this look like the information you</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. See that?</p> <p>2 A. I do now.</p> <p>3 Q. A lot of this is May 5, the date you</p> <p>4 applied.</p> <p>5 A. Okay.</p> <p>6 Q. Says you applied on line. They sent you</p> <p>7 correspondence. Then a recruiter reviewed your</p> <p>8 process. Status changed to under consideration and</p> <p>9 step manager review. See that May 27, 2020?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Know what that means?</p> <p>12 A. Say that again.</p> <p>13 Q. It says May 27, 2020, status changed to</p> <p>14 under consideration. Do you see that?</p> <p>15 A. I do.</p> <p>16 Q. Then it goes to May 27 at 2:40 p.m. at</p> <p>17 the top. Says moved to step offer. Does that sound</p> <p>18 like approximately the date you were offered the job?</p> <p>19 A. I can't say yes or no. I don't have</p> <p>20 recollection.</p> <p>21 Q. May 28 they did a pre-employment</p> <p>22 screening on you. Then May 28 says candidate accepted;</p> <p>23 you accepted the offer. See that?</p> <p>24 A. I do.</p> <p>25 Q. Do you know what's missing from here, Mr.</p>
<p style="text-align: right;">Page 27</p> <p>1 filled out on line to apply for this job?</p> <p>2 A. Without seeing it really in front of me,</p> <p>3 that looks like -- I can't recall because I don't know</p> <p>4 exactly where you are pulling it from or what all you</p> <p>5 are getting ready to show me, so I can't yes or no</p> <p>6 unless I put on my glasses.</p> <p>7 Q. Put on your glasses. I am moving this up</p> <p>8 and down. Stop me if you want me to and tell me</p> <p>9 there's something else --</p> <p>10 A. Repeat the question.</p> <p>11 Q. Does this look like the information that</p> <p>12 you provided to Metro schools?</p> <p>13 A. Possibly so.</p> <p>14 Q. I want to ask you, this supposedly has in</p> <p>15 it everything that occurred. See May 5th, 2021, it</p> <p>16 says application process starts. Does that sound about</p> <p>17 like the date that you filed?</p> <p>18 A. I can't recall. If that's time stamped,</p> <p>19 then that's the time stamp, but I can't recall.</p> <p>20 Q. Do you see where it says events on the</p> <p>21 side?</p> <p>22 A. Where it says events?</p> <p>23 Q. Yes, events on the second column over.</p> <p>24 It has dates, events, details?</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 29</p> <p>1 Hughes?</p> <p>2 A. I am listening.</p> <p>3 Q. Do you know what's missing from here?</p> <p>4 A. Are you looking for an answer from me?</p> <p>5 Q. Yes. Do you see anything missing from</p> <p>6 this? They kept track of everything that happened with</p> <p>7 your application. I want to know if you know that it</p> <p>8 doesn't have any interview dates on here?</p> <p>9 A. I can't speculate to any of that or why</p> <p>10 or why not. I don't have any answer for you for that.</p> <p>11 Q. Let's have this marked Exhibit No. 1 to</p> <p>12 your deposition today. While the court reporter is</p> <p>13 marking it, I will ask some questions about it.</p> <p>14 A. Could you say the last part? You went</p> <p>15 out on my end.</p> <p>16 Q. I want this marked as an exhibit to your</p> <p>17 deposition today. The court reporter is marking it</p> <p>18 Exhibit No. 1 so we know what it is that I have spoken</p> <p>19 with you about.</p> <p>20 A. Okay.</p> <p>21 MR. FOX: No objection.</p> <p>22 (Exhibit No. 1 was marked.)</p> <p>23 BY MS. STEINER:</p> <p>24 Q. Mr. Hughes, where are you from?</p> <p>25 A. Knoxville.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q. Where did you go to high school?</p> <p>2 A. I went to Carter High School.</p> <p>3 Q. Is that a public school there?</p> <p>4 A. It is a public school.</p> <p>5 Q. What year did you graduate from high</p> <p>6 school?</p> <p>7 A. 1997.</p> <p>8 Q. Where did you go to college?</p> <p>9 A. Tennessee State University.</p> <p>10 Q. What years did you attend TSU?</p> <p>11 A. 1997 until 2005 and undergrad.</p> <p>12 Q. Flunk any courses there?</p> <p>13 A. I did.</p> <p>14 Q. What did you flunk?</p> <p>15 A. I can't recall off the top of my head. I</p> <p>16 would need to look at my transcripts.</p> <p>17 Q. Were you kicked out a few semesters?</p> <p>18 A. Was I kicked -- I don't believe I was</p> <p>19 kicked out any semesters, no, ma'am.</p> <p>20 Q. When you flunked the courses, did you</p> <p>21 have to go back in and retake them?</p> <p>22 A. Some I did, yes, ma'am.</p> <p>23 Q. Do you recall how many you actually</p> <p>24 flunked?</p> <p>25 A. I don't recall off the top of my head.</p>	<p style="text-align: right;">Page 32</p> <p>1 period of time you did not attend TSU?</p> <p>2 A. If I am thinking right, I believe so.</p> <p>3 Q. What years?</p> <p>4 A. I don't have that in front of me. I</p> <p>5 would have to again go back 20-something years ago. I</p> <p>6 would have to dig deep to get all that information.</p> <p>7 Q. Was there any probation?</p> <p>8 A. Not necessarily because of probation,</p> <p>9 just some things I was going through at the time as</p> <p>10 well.</p> <p>11 Q. What things were you going through at the</p> <p>12 time?</p> <p>13 A. My best friend was killed by gun violence</p> <p>14 in Knoxville, and I had another friend killed by gun</p> <p>15 violence around eight months later.</p> <p>16 Q. Who was your best friend? What was his</p> <p>17 name? I am sorry I have to ask.</p> <p>18 A. My best friend's name was James Evans,</p> <p>19 Jr.</p> <p>20 Q. Who else died from gun violence?</p> <p>21 A. My other friend's name was Tony Curtis.</p> <p>22 Q. Was it separate incidents where they were</p> <p>23 killed?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. In Knoxville?</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. Were you ever put on administrative</p> <p>2 leave, or whatever they call it at TSU, because of</p> <p>3 grades?</p> <p>4 A. I was never put on leave. I believe -- I</p> <p>5 may stand corrected -- I may have been put on</p> <p>6 probation, but I was never on leave.</p> <p>7 Q. What does probation at TSU mean?</p> <p>8 A. I can't recall that now. I don't know.</p> <p>9 I would have to look at the specific language of that.</p> <p>10 It's been decades, so I don't know, to be honest.</p> <p>11 Q. What years were you put on probation?</p> <p>12 A. I don't remember. I don't have that</p> <p>13 information in front of me.</p> <p>14 Q. Was it more than -- is TSU on quarter or</p> <p>15 semester system?</p> <p>16 A. I believe on the semester.</p> <p>17 Q. How many semesters were you on probation?</p> <p>18 A. I don't recall.</p> <p>19 Q. Does probation mean you can still attend</p> <p>20 school, but if you don't do well, they will put you out</p> <p>21 of school for a bit of time?</p> <p>22 A. I don't have the full definitive</p> <p>23 information on that. It was a red flag for me that I</p> <p>24 needed to get my academics in order.</p> <p>25 Q. From 1997 to 2005, was there any extended</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Yes, ma'am.</p> <p>2 Q. What year was Mr. Evans killed?</p> <p>3 A. Latter 1998.</p> <p>4 Q. What year was Tony Curtis killed?</p> <p>5 A. I want to say '99.</p> <p>6 Q. Was it gang related?</p> <p>7 A. It was not.</p> <p>8 Q. It was just a fluke?</p> <p>9 A. I guess if you want to call it a fluke.</p> <p>10 My friend Tony Curtis was killed over an argument about</p> <p>11 a young lady. My best friend was killed in an</p> <p>12 attempted robbery.</p> <p>13 Q. Was your friend being robbed?</p> <p>14 A. My friend was one of several that were</p> <p>15 being robbed at the time. He unfortunately ran the</p> <p>16 wrong way.</p> <p>17 Q. Did they catch the robbers?</p> <p>18 A. They have not.</p> <p>19 Q. So your friend James Evans, Jr. was</p> <p>20 somewhere where he and several others were robbed at</p> <p>21 gunpoint?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. In Knoxville?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Where were they in Knoxville when they</p>

<p style="text-align: right;">Page 34</p> <p>1 were robbed at gunpoint?</p> <p>2 A. In the backyard of one of our friend's</p> <p>3 homes.</p> <p>4 Q. Did it have anything to do with drugs or</p> <p>5 any other sort of violence?</p> <p>6 A. It did not.</p> <p>7 Q. Why did they come in the backyard of a</p> <p>8 home to rob people?</p> <p>9 A. I can't answer that question. I wish I</p> <p>10 knew, but I don't have the answer to that question. I</p> <p>11 wish I knew so he would still be alive today.</p> <p>12 Q. It is my understanding that you carried a</p> <p>13 gun, correct?</p> <p>14 A. There was one point in time after his</p> <p>15 death I did carry a gun, yes, ma'am.</p> <p>16 Q. The questions I have asked you about</p> <p>17 today about TSU and whether or not you flunked a course</p> <p>18 at TSU and about the guns, did anyone at Metro schools</p> <p>19 ask you these questions in your interview?</p> <p>20 A. I want to go back and say there was not</p> <p>21 guns with an S. There was one gun that I had.</p> <p>22 Everything that was in my -- that I was asked to put in</p> <p>23 any type of resume -- I put in multiple resumes --</p> <p>24 always includes my background.</p> <p>25 Q. The question is different. Did anyone at</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Who did you buy it from?</p> <p>2 A. At a gun sale thing in Knoxville. Not a</p> <p>3 gun sale thing, but one of the gun shows.</p> <p>4 Q. How old were you when you bought it?</p> <p>5 A. I think I was 19 or 20 maybe. I don't</p> <p>6 recall.</p> <p>7 Q. Did you have any other guns besides the</p> <p>8 nine millimeter?</p> <p>9 A. No, ma'am.</p> <p>10 Q. Did you have it registered in your name?</p> <p>11 A. I don't remember.</p> <p>12 Q. Were you charged with some sort of a</p> <p>13 criminal violation with regard to that gun?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. What were you charged with?</p> <p>16 A. Possession of a weapon.</p> <p>17 Q. Where were you when you were charged with</p> <p>18 this?</p> <p>19 A. In Nashville.</p> <p>20 Q. How old were you when you were charged</p> <p>21 with this?</p> <p>22 A. I don't recall. Nineteen or 20, maybe 20</p> <p>23 at the time.</p> <p>24 Q. Did anyone from Metro schools question</p> <p>25 you at all about -- did you plead guilty to the</p>
<p style="text-align: right;">Page 35</p> <p>1 Metro schools ask you questions about TSU and your</p> <p>2 grades there or whether or not you flunked a class or</p> <p>3 were put on probation?</p> <p>4 A. Not that I recall.</p> <p>5 Q. If they had asked you that, would you</p> <p>6 have told them exactly what you just told me?</p> <p>7 A. As far as my recollection, I would be</p> <p>8 honest with them, and if I needed to go back and get</p> <p>9 further information, then I would have gone back and</p> <p>10 gotten further information.</p> <p>11 Q. You were charged with carrying a weapon,</p> <p>12 correct?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Was it registered?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Who was it registered to?</p> <p>17 A. If I recall right, again -- I can't even</p> <p>18 recall.</p> <p>19 Q. What type of weapon was it?</p> <p>20 A. I believe it was a nine millimeter.</p> <p>21 Q. Is that a gun, nine millimeter gun?</p> <p>22 A. I believe that's the caliber of a gun,</p> <p>23 yes, ma'am.</p> <p>24 Q. Who owned the gun?</p> <p>25 A. I actually purchased the gun.</p>	<p style="text-align: right;">Page 37</p> <p>1 possession of the gun?</p> <p>2 A. I believe so.</p> <p>3 Q. Did anyone at Metro schools ask you at</p> <p>4 all about that conviction?</p> <p>5 A. I don't recall.</p> <p>6 Q. Was it Metro police or TSU police? Who</p> <p>7 actually arrested you for that?</p> <p>8 A. I believe Metro police.</p> <p>9 Q. What caused them to arrest you for the</p> <p>10 possession of a weapon?</p> <p>11 A. I can't speak solely for the police. We</p> <p>12 were pulled over because they said I had a broken</p> <p>13 taillight. So this goes to the broken taillight police</p> <p>14 theory that was in place for several decades that is</p> <p>15 now no longer there, and upon pulling us over and</p> <p>16 checking for my license and registration, they said I</p> <p>17 had a gun underneath the seat. Then it escalated from</p> <p>18 there.</p> <p>19 Q. They searched the vehicle then?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. You pled guilty to possession of a</p> <p>22 weapon?</p> <p>23 A. Yes, ma'am. If I am thinking about my</p> <p>24 records right, yes, ma'am.</p> <p>25 Q. They pulled you over for broken</p>

<p style="text-align: right;">Page 38</p> <p>1 taillight. Did they charge you with anything else?</p> <p>2 A. I can't recall.</p> <p>3 Q. Had you ever been charged criminally</p> <p>4 before?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. For what?</p> <p>7 A. I have two other charges. One is a DUI</p> <p>8 and the other is possession of marijuana.</p> <p>9 Q. Do you have any criminal charges out of</p> <p>10 Knox County?</p> <p>11 A. I do not.</p> <p>12 Q. Do you have any other criminal charges</p> <p>13 other than the two DUIs and the possession?</p> <p>14 A. Not that I recall.</p> <p>15 Q. Could you tell me the circumstances of</p> <p>16 the DUIs?</p> <p>17 A. The DUI, not DUIs. Driving while</p> <p>18 drinking. I want to say 2005 or 2006 I have a DUI</p> <p>19 where I got into a wreck after having too much to</p> <p>20 drink.</p> <p>21 Q. So you hit another vehicle?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. How much damage was done to the other</p> <p>24 vehicle?</p> <p>25 A. I can't recall.</p>	<p style="text-align: right;">Page 40</p> <p>1 looked at them for some time, to be honest.</p> <p>2 Q. Did you go to jail?</p> <p>3 A. I did.</p> <p>4 Q. How much time did you have to stay in</p> <p>5 jail?</p> <p>6 A. A couple of hours until I had my friends</p> <p>7 bond me out.</p> <p>8 Q. For the DUI that you had in 2005, 2006,</p> <p>9 did you have to go to jail?</p> <p>10 A. I believe I did just that day until I</p> <p>11 bonded out or may have been I had to do another 24</p> <p>12 hours at some point in time after that. I don't fully</p> <p>13 remember.</p> <p>14 Q. I want to ask you about some of the</p> <p>15 things you put for personal information. This has your</p> <p>16 address on here, this [REDACTED], correct?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Is that what you would have put into the</p> <p>19 computer?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. It has your cell phone. Is that your</p> <p>22 home phone or cell phone?</p> <p>23 A. That's my cell.</p> <p>24 Q. Is that your e-mail?</p> <p>25 A. Yes, ma'am.</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Did you total it?</p> <p>2 A. I can't recall.</p> <p>3 Q. Was there a lawsuit?</p> <p>4 A. No, ma'am.</p> <p>5 Q. Do you know what you registered on the</p> <p>6 DUI machine?</p> <p>7 A. I can't recall.</p> <p>8 Q. You have only been charged one time with</p> <p>9 DUI and that was 2005 or 2006?</p> <p>10 A. As far as driving under the influence of</p> <p>11 alcohol, yes. I believe -- I guess my possession of</p> <p>12 marijuana was a DUI. I don't have my paperwork in</p> <p>13 front of me, but I know there was another charge I had</p> <p>14 that was associated with marijuana.</p> <p>15 Q. Were you under the influence when you</p> <p>16 were charged with possession of marijuana?</p> <p>17 A. At the time I was not.</p> <p>18 Q. Were you charged with DUI at the time you</p> <p>19 were in possession of marijuana?</p> <p>20 A. I don't remember what I was specifically</p> <p>21 charged with, but I do remember that the officer said</p> <p>22 that he smelled marijuana and that he was going to -- I</p> <p>23 can't remember how he phrased it, but I would be going</p> <p>24 to jail because of that. I don't have all of my exact</p> <p>25 records in front of me to tell you verbatim. I haven't</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. That's your driver's license?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Says have you been convicted of any</p> <p>4 traffic or moving violations. You said, yes, correct?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. You put down a DUI in Davidson County,</p> <p>7 and that is the one that resulted in the wreck,</p> <p>8 correct?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Where were you when the wreck occurred?</p> <p>11 A. I believe headed near the airport, so</p> <p>12 that strip of highway I believe near the airport.</p> <p>13 Q. I-40 you mean?</p> <p>14 A. Yeah.</p> <p>15 Q. You were on I-40 going to the airport</p> <p>16 when you were pulled over for DUI when you had the</p> <p>17 wreck?</p> <p>18 A. I don't believe I was going to the</p> <p>19 airport but going that direction, going back home where</p> <p>20 I lived at the time.</p> <p>21 Q. Were you picked up by Tennessee Highway</p> <p>22 Patrol?</p> <p>23 A. I do not believe so, but I cannot answer</p> <p>24 that. It was Metro police department.</p> <p>25 Q. Was anybody hurt in the vehicle that you</p>

<p style="text-align: right;">Page 42</p> <p>1 hit?</p> <p>2 A. Not that I can recall off the top of my</p> <p>3 head.</p> <p>4 Q. How did you hit the other vehicle?</p> <p>5 A. I don't recall.</p> <p>6 Q. Do you recall if you ran into the back,</p> <p>7 ran into the side, ran into the front of the other</p> <p>8 vehicle?</p> <p>9 A. I don't recall.</p> <p>10 Q. Do you recall how many vehicles were</p> <p>11 involved in the accident?</p> <p>12 A. If I am remembering my report right, it</p> <p>13 was just myself and this other vehicle.</p> <p>14 Q. Did you have insurance when this</p> <p>15 occurred?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Did the claim go over your policy limits?</p> <p>18 A. I don't recall.</p> <p>19 Q. Did you have to hire a lawyer to help</p> <p>20 you?</p> <p>21 A. I know I didn't have the money for a</p> <p>22 lawyer. Probably had a public defender.</p> <p>23 Q. Did anyone from Metro schools ask you any</p> <p>24 questions about the 2006 DUI or the 2004 speeding with</p> <p>25 marijuana possession?</p>	<p style="text-align: right;">Page 44</p> <p>1 A. I do not believe so. I can't recall.</p> <p>2 Q. If anyone had asked you questions about</p> <p>3 your criminal record, whether it be DUI, marijuana</p> <p>4 possession, or misdemeanor possession of a registered</p> <p>5 weapon, would you have been honest and told them?</p> <p>6 A. Absolutely. If I had to do it, yes, I</p> <p>7 would have absolutely told them. I don't know if I did</p> <p>8 or didn't or had the conversation, but I never hide my</p> <p>9 background.</p> <p>10 Q. Do you recall -- I need specifics here.</p> <p>11 Do you recall anybody at Metro schools asking you any</p> <p>12 question about that saying what's going on with these</p> <p>13 criminal charges against you?</p> <p>14 A. I do not recall.</p> <p>15 Q. I am going to ask you something else that</p> <p>16 was on here. It asked for your educational. You put</p> <p>17 down Tennessee State University. Did anyone ask you</p> <p>18 what year you got out of high school and why it took</p> <p>19 you that extra time to get your bachelor's degree?</p> <p>20 A. I don't recall. These conversations were</p> <p>21 over two years ago. I don't recall all the ins and</p> <p>22 outs of what was particularly asked at the time to be</p> <p>23 honest with you.</p> <p>24 Q. You see your GPA 2.5 out of 4?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 43</p> <p>1 A. I don't recall. I don't.</p> <p>2 Q. Let's go down a little farther.</p> <p>3 Convicted of a felony or misdemeanor in this state or</p> <p>4 any other? You said, yes. You said 1999 misdemeanor,</p> <p>5 possession of registered weapon.</p> <p>6 A. Yes.</p> <p>7 Q. Does that mean the weapon was registered</p> <p>8 or wasn't registered?</p> <p>9 A. It says there registered, so I am going</p> <p>10 with it means it was registered.</p> <p>11 Q. You wrote this, correct?</p> <p>12 A. Yes.</p> <p>13 Q. This is your application, correct?</p> <p>14 A. Yes. I believe that's typing it directly</p> <p>15 from the information as I was going through whatever my</p> <p>16 record was at the time, so, yes.</p> <p>17 Q. Do you have any criminal charges filed</p> <p>18 against you in any other state in the United States?</p> <p>19 A. I do not.</p> <p>20 Q. Do you realize that the DUI is also and</p> <p>21 the marijuana possession are also criminal offenses?</p> <p>22 A. Yes.</p> <p>23 Q. Did anyone at Metro schools ask you any</p> <p>24 questions about the misdemeanor possession of a</p> <p>25 registered weapon?</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. What does that correspond to at TSU?</p> <p>2 A. I would have to go back through and look</p> <p>3 at that information. I don't recall.</p> <p>4 Q. You know that a four corresponds to an A,</p> <p>5 doesn't it?</p> <p>6 A. I believe so, but I would need to go back</p> <p>7 to TSU and get that information.</p> <p>8 Q. You know that a three corresponds to a B?</p> <p>9 A. I would have to have -- I don't want to</p> <p>10 say yes and I'm not factually correct. I would need to</p> <p>11 go back to TSU to verify those metrics to look it up.</p> <p>12 Q. You are in education right now. It seems</p> <p>13 to me that you would know what a 4.0 is, but you are</p> <p>14 telling me today under oath you don't?</p> <p>15 A. Before I make any statement, I would like</p> <p>16 to have the information in front of me so I can make a</p> <p>17 factual statement before I just say yes because I think</p> <p>18 it could be. I want to make certain it actually is. I</p> <p>19 haven't been in followup with TSU as of recently to</p> <p>20 figure out their grading scale or what everything is</p> <p>21 going on. I would need to get that to make a factual</p> <p>22 statement as I am under oath.</p> <p>23 Q. Are you aware most of the universities</p> <p>24 use the same grading system where 4.0 is an A?</p> <p>25 A. Again, I am not involved in a lot of</p>

<p style="text-align: right;">Page 46</p> <p>1 other higher institutions. So, again, I could say yes 2 to say yes, but I want to be factual just to make 3 certain I am factual for my own invocation and giving 4 correct information while I'm under oath. 5 Q. What was your grade point average when at 6 TSU? 7 A. I would have to go back through and look 8 up all the cumulative and make certain, but, as you see 9 right there, I put 2.5, so that must have been the 10 information as I received it and put it into my report. 11 Q. Do you know what 2.5 corresponds to? 12 A. Again, as I said earlier, I can't speak 13 to that right now, but I am sure -- seems like you are 14 going to tell me or provide insight. 15 MR. FOX: Object to the form. 16 BY MS. STEINER: 17 Q. Do you recall ever telling anybody that 18 you had a Ph.D.? 19 A. Say that again. 20 Q. Do you recall ever telling anybody that 21 you had a Ph.D.? 22 A. Never, because I do not have a Ph.D. 23 Q. Did you ever tell anybody you had a 24 master's? 25 A. A bachelor's.</p>	<p style="text-align: right;">Page 48</p> <p>1 little later. I would have to go back in and think 2 about it. 3 Q. What did you do for Carrabba's? 4 A. I was a server. 5 Q. Then after you left -- how long did you 6 work for Carrabba's? 7 A. I don't recall. Couple of years maybe. 8 Q. Would that get you through -- assuming 9 you got out of TSU in 2006, does that get you through 10 about 2008? 11 A. I left TSU in 2005. At the same time I 12 was interning with Harold Ford, Jr. working at the 13 state parties doing some stuff. I can't recall all the 14 things that I was doing in between 2005 to 2008 with 15 some of the main jobs and other jobs I had. 16 Q. You had multiple jobs? 17 A. Yes, ma'am. 18 Q. When you left Harold Ford, Jr.'s, 19 campaign, where did you go? 20 A. I would have to look at all my resumes to 21 figure that out. I can't recall off the top of my 22 head. 23 Q. How did you come about being hired on at 24 Megan Barry's. 25 A. Did you say how did I come about being</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Master's degree? 2 A. No, ma'am, because I do not have a 3 master's degree. 4 Q. Have you ever been fired from a job? 5 A. Not that I can recall. 6 Q. Have you ever been suspended or put on 7 probation at a job? 8 A. Not that I can recall. 9 Q. When you first got out of TSU, where did 10 you work? 11 A. I mean there are several jobs that I had 12 -- RPS. I worked at Ruby Tuesday for a while. I 13 worked at Carrabba's at some point in time. I worked 14 during that time some for Harold Ford, Jr. I worked at 15 some point under his campaign. I worked for the 16 Tennessee democratic party at points in time right out 17 of TSU. 18 Q. What did you do for Ruby Tuesday? 19 A. I worked in the kitchen and then worked 20 as a server. 21 Q. Was that after you got out of TSU? 22 A. If I recall it was in the middle of, 23 maybe a little bit after. 24 Q. When did you work for Carrabba's? 25 A. Probably around the same time, maybe a</p>	<p style="text-align: right;">Page 49</p> <p>1 hired? 2 Q. Yes. 3 A. Hired or fired? 4 Q. Hired. 5 A. Hired. So coming from 2010, I was the 6 political director, as well as field director for 7 congressional campaign in South Carolina and had been 8 working on that one for about a year. Prior to that I 9 had been working at the state democratic party off and 10 on some time working in different community factions. 11 Megan contacted me as I was working in Virginia at the 12 time on a campaign, would I be interested in coming 13 back and managing her re-election campaign at large. 14 Q. Did you do that? 15 A. I did. 16 Q. When she got to be mayor, you were 17 brought on to her administration, correct? 18 A. Yes, ma'am. I was hired on to work for 19 her, yes, ma'am. 20 Q. What was your position? 21 A. My position under Megan she brought me in 22 to do equity and work force development and serve as a 23 labor liaison, do a lot of outreach within the 24 community and build structures around equity and 25 inclusion.</p>

<p style="text-align: right;">Page 50</p> <p>1 Q. Were you working with the union?</p> <p>2 A. At the time of working for Megan or</p> <p>3 before?</p> <p>4 Q. When you were working for Megan Barry,</p> <p>5 were you working with the union?</p> <p>6 A. No, ma'am. At the time I was in the</p> <p>7 mayor's office, I was working for Megan Barry, the</p> <p>8 mayor, in the mayor's office.</p> <p>9 Q. Were you dealing with the mayor's office</p> <p>10 contacting unions, though?</p> <p>11 A. Yes, ma'am. I was a liaison to the</p> <p>12 unions from the mayor's office.</p> <p>13 Q. Is that the main thing you did for Megan</p> <p>14 Barry?</p> <p>15 A. That was one of several things I did for</p> <p>16 Megan Barry.</p> <p>17 Q. What years did you work for Megan Barry?</p> <p>18 A. I worked for Megan Barry -- in the</p> <p>19 mayor's office I worked for Megan Barry from 2015 to</p> <p>20 the time of her resignation.</p> <p>21 Q. Which was what year?</p> <p>22 A. I think 2017, 2018, maybe beginning of</p> <p>23 2018.</p> <p>24 Q. Then where did you go to work?</p> <p>25 A. I stayed working with Metro office under</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Did you put in the information that is on</p> <p>2 your LinkedIn page?</p> <p>3 A. I did some at the time. I had a branding</p> <p>4 person working with me to help me get that up to par.</p> <p>5 Q. You made sure it was accurate, correct?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Is your LinkedIn page accurate?</p> <p>8 A. I actually haven't been on LinkedIn as</p> <p>9 much as I was at the beginning, so I would need to go</p> <p>10 back in. I am pretty sure not much has changed.</p> <p>11 Q. Do you see where it says experience,</p> <p>12 Executive Officer for Diversity, Equity, and Inclusion</p> <p>13 and says June 2020 through present, one year and ten</p> <p>14 months; is that right?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Then it says diversity -- diversity I</p> <p>17 believe, equity and inclusion consultant, Blueprint</p> <p>18 Solutions Group, LLC, from October 2019 through the</p> <p>19 present, two years and six months. Are you currently</p> <p>20 working for Blueprint Solutions Group, LLC?</p> <p>21 A. Say the last part again. You went out.</p> <p>22 Q. Are you currently working for Blueprint</p> <p>23 Solutions Group, LLC?</p> <p>24 A. Blueprint Solutions Group, LLC, was an</p> <p>25 entity I started myself. It's not a sole</p>
<p style="text-align: right;">Page 51</p> <p>1 Mayor Briley.</p> <p>2 Q. How long did you stay there?</p> <p>3 A. Up until he did not win his election in</p> <p>4 2019.</p> <p>5 Q. When did you leave the mayor's office</p> <p>6 under Briley?</p> <p>7 A. October 2019 I believe.</p> <p>8 Q. Then is that when you went to work for</p> <p>9 Bloomberg?</p> <p>10 A. About a month or so later, yes, ma'am.</p> <p>11 Q. Are you currently working any other job?</p> <p>12 A. Currently, no, right now.</p> <p>13 Q. Have you worked any other job while you</p> <p>14 have been at Metro schools?</p> <p>15 A. No, ma'am.</p> <p>16 Q. Stop the share. I want to show you</p> <p>17 something else. Can you see this document that I am</p> <p>18 showing you right now?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Do you recognize this guy?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. That's you?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Is this your LinkedIn page?</p> <p>25 A. It looks to be.</p>	<p style="text-align: right;">Page 53</p> <p>1 proprietorship, but it's my consulting firm I started,</p> <p>2 so it doesn't work for anybody, other than Ashford, but</p> <p>3 because I have been working with the schools, I haven't</p> <p>4 taken on any other clients outside of working for</p> <p>5 public schools right now.</p> <p>6 Q. Does Blueprint Solutions Group still</p> <p>7 exist?</p> <p>8 A. It does exist. I was on a call last week</p> <p>9 and this morning, last week or week before working out</p> <p>10 some paperwork because they cannot find my entity, and</p> <p>11 I needed to do that for tax record updates. Yes, I am</p> <p>12 still here.</p> <p>13 Q. Do you have any employees?</p> <p>14 A. I do not.</p> <p>15 Q. Do you have any contracts?</p> <p>16 A. I do not.</p> <p>17 Q. Have you made any income from October</p> <p>18 2019 through the present date?</p> <p>19 A. I did. That was one of the reasons I</p> <p>20 wanted to get all my tax stuff. There was a speaking</p> <p>21 engagement I had with Educators Cooperative. They</p> <p>22 wanted to pay me for that. I asked them to put it</p> <p>23 under my LLC so as not to conflate anything or be on</p> <p>24 unethical terms with the school district. That was the</p> <p>25 only thing I have done since then.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q. I am going into this with you. Only 2 income you have had with Blueprint Solutions Group, 3 LLC, from October 2019 to present date was a speaking 4 engagement?</p> <p>5 A. That is not correct. After I finished 6 working with Bloomberg October 2019, until I worked 7 with the schools, I was paid under Blueprint Solutions 8 Group by Bloomberg. The time that I came to work for 9 MNPS in June or July of 2020, I have not taken any 10 clients since then. The one bit of any type of income 11 that I have had it has been in 2021 when I spoke at an 12 engagement with the Educators Cooperative and they paid 13 me for that speaking engagement. Since I left 14 Bloomberg in 2020, that is the only thing I have done 15 under Blueprint Solutions Group.</p> <p>16 Q. Why did you ask the educators who paid 17 you to give a speech to pay you through Diversity, 18 Equity and Inclusion?</p> <p>19 A. Under my consulting firm?</p> <p>20 Q. Yes.</p> <p>21 A. So it would not conflate if there was 22 anything ethically wrong with taking that as a Metro 23 employee because it would have gone under Ashford 24 Hughes and I would have to report it. I said, I have 25 an LLC; I'll do it under my business, and then I can do</p>	<p style="text-align: right;">Page 56</p> <p>1 that every time when taxes are to be filed if you are 2 doing anything that isn't MNPS salary related, that you 3 have to file it. I believe I need to go back and read 4 the full document again, but I try to stay above and 5 make sure I am doing everything ethically correct.</p> <p>6 Q. So do you know why Metro school wants to 7 know whether or not you had outside income?</p> <p>8 A. I cannot speak to that. I do not. I 9 thought it was part of the ethics process.</p> <p>10 Q. Who did you give the speech to?</p> <p>11 A. It was to a group called the Educators 12 Cooperative. They work with teachers giving them 13 particular trainings and get them in front of different 14 groups. I think I was on a panel at the time.</p> <p>15 Q. How much did they pay you?</p> <p>16 A. I think it was a thousand dollars.</p> <p>17 Q. You had them pay your entity so it would 18 not be reported through this document system that HR 19 would send you at Metro schools, correct?</p> <p>20 A. I don't think that's the way I stated it. 21 I had them send it to my LLC, so then I could make 22 certain to report it when it was time to file the 23 report at the end of the year so as not to be in 24 violation of -- to be on the up and up about moneys 25 that I earned that were outside of MNPS. So there was</p>
<p style="text-align: right;">Page 55</p> <p>1 taxes and report it there. You still have to report 2 these things with Metro government.</p> <p>3 Q. If you work for Metro government and give 4 a speech that you get funds in for, you have to report 5 it to Metro government, correct?</p> <p>6 A. Yes. As I know it, if you get any funds, 7 if you take any income in that is not directly coming 8 from your public entity, Metro Public Schools, you have 9 to file that in an upcoming document that we get as we 10 file taxes. I can't think of the name of what the 11 document is, but it asks us all those things.</p> <p>12 Q. So then do you know who provides you with 13 this document?</p> <p>14 A. When I was in the mayor's office, we did 15 them every year around tax time, and ever since I have 16 been here at MNPS, this is a document I believe HR 17 sends to everybody.</p> <p>18 Q. It ask you have you earned any outside 19 income, correct?</p> <p>20 A. That's what I believe the document says, 21 yes, ma'am.</p> <p>22 Q. So if you have to file it and send it 23 back to Metro schools, is it on an annual basis?</p> <p>24 A. I received them twice since I have been 25 here, so I am going on a limb and say, yes, you receive</p>	<p style="text-align: right;">Page 57</p> <p>1 nothing ethically going on that I did not account for.</p> <p>2 Q. You filed a form with MNPS that says, I 3 own a company called Blueprint Solutions Group and they 4 got paid a thousand dollars?</p> <p>5 A. I would need to go back and look at the 6 form again, exactly what the form asks, how I filled it 7 out and all of those things.</p> <p>8 Q. Were you just doing your taxes right now?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Did you claim a thousand dollars income 11 for Blueprint Solutions Group?</p> <p>12 A. I will be claiming that, yes, ma'am.</p> <p>13 Q. You haven't claimed it yet, you haven't 14 filed taxes yet?</p> <p>15 A. I have not.</p> <p>16 Q. Do you prepare your own taxes?</p> <p>17 A. No, ma'am. I have a company that does it 18 for me.</p> <p>19 Q. What company does that?</p> <p>20 A. The young lady's name is -- I just had 21 it. Her name is Taneka Givens (phonetic spelling); she 22 is out of Indiana. I would have to find the name for 23 you here in a second.</p> <p>24 Q. If you can find that, let me know. That 25 would be great. Have you filed the form Metro schools</p>

<p style="text-align: right;">Page 58</p> <p>1 wants you to file?</p> <p>2 A. I have not filed anything as of yet,</p> <p>3 because I am still in the process of gathering and</p> <p>4 getting all my paperwork prepared.</p> <p>5 Q. It's pretty simple; you only got a</p> <p>6 thousand dollars, correct?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. Did you get a form from the group that</p> <p>9 you gave the speech for?</p> <p>10 A. Yes, they sent me something earlier this</p> <p>11 year.</p> <p>12 Q. Was it a W-9 form?</p> <p>13 A. I believe so.</p> <p>14 Q. They sent it to Blueprint Solutions</p> <p>15 Group, LLC?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. The forms that you filed with Metro --</p> <p>18 when are you supposed to file those by?</p> <p>19 A. I don't have that date in front of me</p> <p>20 right now.</p> <p>21 Q. The income was received in 2021, correct?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. So then do you know whether or not they</p> <p>24 sent you the form in 2021?</p> <p>25 A. If who sent me the form?</p>	<p style="text-align: right;">Page 60</p> <p>1 under Blueprint Solutions, LLC, up to the time</p> <p>2 Bloomberg dissolved his campaign. I believe that was</p> <p>3 in late March. I was paid until April or May, but,</p> <p>4 again, I would need to go back through the contract and</p> <p>5 look at all that, but Blueprint Solutions Group was how</p> <p>6 I got paid as a contractor, as I said earlier, with</p> <p>7 Michael Bloomberg campaign.</p> <p>8 Q. You are correct. Anytime I say something</p> <p>9 wrong you let me know.</p> <p>10 A. Okay.</p> <p>11 Q. Blueprint Solutions Group had no</p> <p>12 employees except for you?</p> <p>13 A. That is correct.</p> <p>14 Q. Did Blueprint Solutions Group, LLC, file</p> <p>15 its own income tax return?</p> <p>16 A. It was filed within my family income tax</p> <p>17 information.</p> <p>18 Q. Did it have a separate return, an LLC</p> <p>19 return?</p> <p>20 A. No, ma'am.</p> <p>21 Q. Who was your supervisor at Bloomberg?</p> <p>22 A. My supervisor at Bloomberg was Courtney</p> <p>23 Wheeler.</p> <p>24 Q. Where was she located?</p> <p>25 A. She was located in Nashville.</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Metro schools, HR sent you the form?</p> <p>2 A. Yes, I believe I have that in my</p> <p>3 documents.</p> <p>4 Q. Do you know when in 2021 they sent it to</p> <p>5 you?</p> <p>6 A. I do not. I believe the same time I got</p> <p>7 my W2 form, maybe around that time, but I cannot recall</p> <p>8 off the top of my head.</p> <p>9 Q. So then as of today's date, April 11,</p> <p>10 2022, you have not disclosed to Metro schools you got</p> <p>11 this thousand dollars?</p> <p>12 A. I have not filed my paperwork for</p> <p>13 anything as of right now. That is correct.</p> <p>14 Q. From October 2019 through the date that</p> <p>15 you got hired on at Metro, Blueprint Solutions made no</p> <p>16 income, correct?</p> <p>17 A. Say the last part again.</p> <p>18 Q. On the date that you left the mayor's</p> <p>19 office, October 2019, through the date you applied and</p> <p>20 got hired by Metro schools, Blueprint Solutions Group</p> <p>21 made no income, correct?</p> <p>22 A. That is false. Earlier I said to you, as</p> <p>23 I am on the record saying, when I began working for</p> <p>24 Michael Bloomberg, I began working under a contract. I</p> <p>25 was clear saying I had a contract, and the contract was</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. Who does she work for in Nashville?</p> <p>2 A. She has her own consulting firm. I can't</p> <p>3 remember the name. I think she made changes in between</p> <p>4 then. I cannot speak to who she is with or the name of</p> <p>5 her company as of right now.</p> <p>6 MS. STEINER: I'd like to mark your</p> <p>7 LinkedIn profile as Exhibit No. 2.</p> <p>8 (Exhibit No. 2 was marked.)</p> <p>9 MR. FOX: No objection.</p> <p>10 BY MS. STEINER:</p> <p>11 Q. I would like to show you something else.</p> <p>12 A. Okay.</p> <p>13 Q. Do you see this document that's a record</p> <p>14 check Nashville, Davidson County, Tennessee, Criminal</p> <p>15 Court Clerk?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Have you seen this document before today?</p> <p>18 A. I don't believe so.</p> <p>19 Q. That is you, Ashford Rolland Hughes,</p> <p>20 correct?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Date of birth December 8, 1978?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. This shows you were charged with</p> <p>25 possession of casual exchange and convicted of that?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. Having just seen this document today, I 2 would need to look at it and fully go through 3 everything it is to be factually correct in saying yes. 4 Q. It also has the DUI May 25, 2004, and it 5 looks like you were convicted of reckless driving. Do 6 you recall that? 7 A. I believe so. 8 Q. Then on May 25th of 2004, you were also 9 charged with implied consent. Do you recall that? 10 A. I believe those were connected with each 11 other, if I am not mistaken. I would have to go back 12 and look at the document in my hand. It's kind of hard 13 to see on screen, but I can see it. 14 Q. Does that mean the police asked you to 15 blow into the DUI machine and you didn't want to do 16 that? Is that what that is about? 17 A. I can't speak to the legalities. I would 18 need to go back and look at everything. I don't recall 19 everything that took place at that time. 20 Q. Do you see also you were charged with 21 driver's license suspended? Can you tell me what 22 happened to your license then? 23 A. I can't recall. We're talking about 18 24 years ago. I would need to -- I can't recall. 25 Q. Here is the DUI I think you were</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Eventually she did get back in contact 2 with me. 3 Q. Was she helpful? 4 A. I believe she gave me the information 5 that she wanted to give me. 6 Q. Are you implying she did not give you 7 some information? 8 A. She just let me know it was a tough job 9 and it would take at least several years for me to be 10 able to do the job accurately. 11 Q. Did she tell you who to contact if you 12 needed help? 13 A. No, ma'am. 14 Q. Did she list some of the employees that 15 worked there and what their strengths were? 16 A. No, ma'am. 17 Q. Did you have like a 40-minute 18 conversation with her where she explained her job to 19 you? 20 A. I think it may have been 30 or 40 minutes 21 where she was giving me a little bit of insight, yes, 22 ma'am. 23 Q. Who does School Choice now? Who is the 24 main person handling that? 25 A. As we talked about earlier, I supervise</p>
<p style="text-align: right;">Page 63</p> <p>1 convicted of in 2007, correct? 2 A. Yes, ma'am. 3 Q. Then I think the last thing here is 4 weapon, unlawful possession. Do you know why they said 5 you unlawfully possessed it? 6 A. I can't recall. I don't know. I am not 7 an officer to be able to stipulate that. I don't 8 recall. 9 MS. STEINER: Can we have this record 10 marked Exhibit 3 to your deposition? 11 MR. FOX: No objection. 12 (Exhibit No. 3 was marked.) 13 BY MS. STEINER: 14 Q. Mr. Hughes, when you applied did anyone 15 ask you anything about Blueprint Solutions and what you 16 did for Blueprint? 17 A. Not that I recall. 18 Q. Do you know my client, Jane Doe? 19 A. I do not. 20 Q. Have you ever had any dealings with Jane 21 Doe that you recall? 22 A. I recall potentially reaching out as 23 introduction and to get insight into the office and 24 team she had managed. 25 Q. Did Jane Doe help you?</p>	<p style="text-align: right;">Page 65</p> <p>1 the team of three full-time employees and one part-time 2 employee. I do that in partnership. 3 Q. What else do you do for Metro schools? 4 A. I serve as the Executive Officer for 5 Diversity, Equity, and Inclusion. I work directly to 6 support some of the schools with going in and reading 7 to young boys and girls and anything else that I am 8 asked to do. 9 Q. You said you support the schools by going 10 in to read. You mean you personally go in and read to 11 them? 12 A. Absolutely. 13 Q. Anything else you do as Executive Officer 14 of Diversity, Equity, and Inclusion? 15 A. I supervise two of our equity coaches we 16 have right now. I make certain right now on the DE&I 17 that we have cultivated and developed an equity road 18 map. We work with our educators to make certain we 19 provide planning and training for them on the pedagogy 20 of how to increase equity within schools. 21 I worked with various departments to make 22 certain that equity is living within their department. 23 I work closely with all of our chiefs looking at 24 different programmatic work that can have equity lenses 25 administered to them.</p>

<p style="text-align: right;">Page 66</p> <p>1 I go in and have at least two schools that</p> <p>2 I regularly support, whether it's to come in and help</p> <p>3 in classrooms, whether it's just to be there, to do</p> <p>4 work there and help them connect with students, as well</p> <p>5 as I support many other schools, as I said earlier, by</p> <p>6 going in and reading, doing different type of</p> <p>7 enrichment, particularly with some of the young men we</p> <p>8 have in schools.</p> <p>9 I work as a liaison, work with some of</p> <p>10 our HVCUs in some of our faith communities and black</p> <p>11 and brown communities to make sure they are aware of</p> <p>12 things. I do a plethora of things for Metro public</p> <p>13 schools right now.</p> <p>14 Q. Let's talk about last week. What was on</p> <p>15 the calendar?</p> <p>16 A. Last week? Is that what you said?</p> <p>17 Q. Yes.</p> <p>18 A. Last week -- I mean like every week we</p> <p>19 make certain we are finalizing the lottery of placement</p> <p>20 to make sure that every -- on the School Choice side</p> <p>21 making certain every family has what they needed.</p> <p>22 We're partnering with a department to make certain the</p> <p>23 Promising Scholars program is run well and that we're</p> <p>24 reaching out to families on that side of things to make</p> <p>25 certain that everybody is registering for Promising</p>	<p style="text-align: right;">Page 68</p> <p>1 team every Tuesday and Thursday. We had meetings with</p> <p>2 the Promising Scholars team and others that were part</p> <p>3 of that process, several meetings with that throughout</p> <p>4 the week to get families as our deadline is upcoming.</p> <p>5 Q. Is it a fair statement you don't pick</p> <p>6 kids to go to Metro schools, that the families pick</p> <p>7 you?</p> <p>8 A. Repeat that. You went in and out.</p> <p>9 Q. You do not pick the kids who attend Metro</p> <p>10 schools, their parents make the decision to allow their</p> <p>11 kids to attend Metro schools?</p> <p>12 A. I believe that's an accurate statement.</p> <p>13 Q. That's not accurate?</p> <p>14 A. I said I believe that's an accurate</p> <p>15 statement.</p> <p>16 Q. You do not?</p> <p>17 A. I do. I do believe it's an accurate</p> <p>18 statement.</p> <p>19 Q. So then with regard to Diversity, Equity</p> <p>20 and Inclusion, with regard to the students, you can go</p> <p>21 out and recruit minority students, correct? It's not</p> <p>22 like a private school?</p> <p>23 A. I am not certain what that has to do with</p> <p>24 Diversity, Equity and Inclusion me going to pick the</p> <p>25 students.</p>
<p style="text-align: right;">Page 67</p> <p>1 Scholars and that they have all the information that is</p> <p>2 needed to accurately get their kid into our summer</p> <p>3 program.</p> <p>4 On the equity side of things, was working</p> <p>5 with various groups, various stakeholders internally</p> <p>6 and externally focused on upcoming summer training for</p> <p>7 teachers and educators in support of finalizing some</p> <p>8 work with our partners on the equity road map and</p> <p>9 looking at other partnerships we have going on to make</p> <p>10 certain we have specific measures in place to show</p> <p>11 growth and progress.</p> <p>12 Q. Who did you talk to to show growth and</p> <p>13 progress last week? Who did you talk to?</p> <p>14 A. I had my one on one meeting with Dr.</p> <p>15 Battle last week. We had my meeting -- several</p> <p>16 meetings with leaders in the professional learning</p> <p>17 spectrum and our chief of schools. I meet with my</p> <p>18 equity coaches in a formalized meeting every Tuesday</p> <p>19 morning to map that out.</p> <p>20 I met with our chief of schools. We are</p> <p>21 partnered with an entity working on the teaching job.</p> <p>22 We met for three hours one day last week going over</p> <p>23 that process. I could continue on. I would have to</p> <p>24 look at my calendar. That's on the equity side.</p> <p>25 On the school option side, I meet with my</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. Meaning the Diversity, Equity and</p> <p>2 Inclusion isn't really something that concerns the</p> <p>3 student so much as it does the employees? Am I right</p> <p>4 on that or wrong?</p> <p>5 A. I would say you are wrong on that. DEI</p> <p>6 work is not -- DEI work encompasses a lot, but it does</p> <p>7 impact the student.</p> <p>8 Q. DEI work -- that's an acronym you use for</p> <p>9 that, correct?</p> <p>10 A. That's instead of saying Diversity,</p> <p>11 Equity and Inclusion every time, yes, DEI is the</p> <p>12 acronym.</p> <p>13 Q. That's much easier. You are not a</p> <p>14 teacher, correct?</p> <p>15 A. That is correct.</p> <p>16 Q. You are not certificated?</p> <p>17 A. That is correct.</p> <p>18 Q. With regard to the students, what is it</p> <p>19 that you are doing?</p> <p>20 A. So when it comes to -- you mean as far as</p> <p>21 -- let me make sure I answer the question clearly.</p> <p>22 What am I doing as far as Diversity, Equity and</p> <p>23 Inclusion?</p> <p>24 Q. DEI.</p> <p>25 A. Couple of things. One, I am not</p>

<p style="text-align: right;">Page 70</p> <p>1 connected directly to the students in that space. I am 2 not a direct advocate. I am five steps away. What I 3 do from the Diversity, Equity and Inclusion side is to 4 make certain I make the conditions by which every 5 student has what they need to be successful. That 6 means not just looking at just outcomes but processes 7 we have in place to increase to make certain those 8 students with the most needs right now get what they 9 need.</p> <p>10 When it comes to directly aligning with 11 students and getting teachers to align with students, 12 we are working in our work to make certain we have 13 frameworks in place to cultivate student voice in all 14 that we do, the same frameworks we work to cultivate 15 family voice so we have key partnerships between our 16 educators in the classroom and in the building directly 17 connected with our students so that students can feel 18 engaged with their identities or values. I help to 19 create the conditions by which those things can take 20 place for our students and they can benefit from those 21 conditions. They have agencies to tell what they need 22 to get to those conditions.</p> <p>23 Q. Was this in place before you took over? 24 Was any of this in place before you took over at Metro 25 schools?</p>	<p style="text-align: right;">Page 72</p> <p>1 would have to go back and look at that whatever the 2 costs for FTEs were. It is a conversation that I 3 talked about, hey, this is what we could be to continue 4 to move the needle on our early equity journey.</p> <p>5 Q. Did anyone tell you that there is no 6 funds available for --</p> <p>7 A. I haven't gotten knee deep in the full 8 conversation about that. Nobody has told me that I can 9 recall absolutely no or where we are going.</p> <p>10 Q. Who do you report to?</p> <p>11 A. I directly report to Hank Clay.</p> <p>12 Q. Who does Mr. Clay report to?</p> <p>13 A. I believe Hank reports directly to Dr. 14 Battle.</p> <p>15 Q. Your background in Diversity, Equity and 16 Inclusion, did you handle this at any point before you 17 went to Mayor Megan Barry's office?</p> <p>18 A. Yes.</p> <p>19 Q. Where?</p> <p>20 A. I mean my entire career has been in 21 Diversity, Equity and Inclusion. It is just because of 22 recently that we have these names around it. As I was 23 serving as political director for the Tennessee 24 democratic party, what I was working on was Diversity, 25 Equity and Inclusion. As I was working as the first</p>
<p style="text-align: right;">Page 71</p> <p>1 A. I can't speak to that. I have been 2 cultivating this from my knowledge in building systems 3 in previous organizations. I cannot say everything I 4 am working toward right now or that the district is 5 working toward was in place before I got here as far as 6 Diversity, Equity and Inclusion. I do not believe 7 there was an office situated here.</p> <p>8 Q. Did anyone recently ask for major funding 9 for your office, a little over a million dollars?</p> <p>10 A. Have I asked for major funding?</p> <p>11 Q. Has anybody asked for major funding for 12 your office?</p> <p>13 A. There are always multiple groups going 14 out. We have several that are coming to speak this 15 week I believe that are always asking for more funding 16 to work on Diversity, Equity and Inclusion goals.</p> <p>17 Q. I heard that your department is asking 18 for almost 1.5 million in additional funding so you can 19 hire more staff for your department. Am I right on 20 that?</p> <p>21 A. For my department we've asked or what I 22 made notice of as we went through a particular budget 23 process for us to get to where we might want to be 24 these are some things we will need going down the line. 25 I don't recall it being over a million dollars. I</p>	<p style="text-align: right;">Page 73</p> <p>1 person to get hired on on a congressional race in South 2 Carolina as political director and the field director, 3 we were working on elements of Diversity, Equity and 4 Inclusion, and I can date it back to my time working 5 for the TNDP in my early years working with Harold 6 Ford, Jr. and others working on the concepts and 7 practices of the DE&I work. Then I can equate it to 8 the work I was doing when I was working with my labor 9 union. I was a political and labor organizer in 10 multiple states.</p> <p>11 Q. It didn't have anything to do with 12 schools, though, correct?</p> <p>13 A. You said those other jobs did not have 14 anything --</p> <p>15 Q. To do with schools?</p> <p>16 A. At the time I did not have any 17 interaction with Metro schools at the time outside of 18 the mayor's office when I worked with the education 19 liaison at the time.</p> <p>20 Q. When you worked on the Bloomberg campaign 21 and all these political campaigns, correct me if I am 22 wrong, but seems like to me that would be in terms of 23 trying to get minorities to come in to vote and join 24 the democratic party? That's the goal, correct?</p> <p>25 A. That is incorrect. I am going to push</p>

<p style="text-align: right;">Page 74</p> <p>1 back on saying the word minorities. Minorities has a 2 negative connotation. What I was working on with 3 Harold Ford, Jr., and others was not just to come vote 4 or join the democratic party. One was how do we 5 engage, involve and empower our communities to know the 6 information and then to use the information to utilize 7 our voices to express what we need as a community and 8 not just with Harold Ford and some of the other places, 9 not every time that I worked with the democratic party 10 has it been on electoral policies only. Some have been 11 organizing and galvanizing the community to understand 12 what's available for them and how do we work together 13 to get what we need.</p> <p>14 Q. Harold Ford -- correct me if I am wrong 15 because I can't really remember -- did he not have some 16 scandal that caused him to leave office?</p> <p>17 A. Harold Ford, Jr.? I can't speak to that. 18 Harold Ford, Jr. left office because he did not win the 19 election for U.S. Senate.</p> <p>20 Q. Was there some allegation, though?</p> <p>21 A. Not that I recall for Harold Ford, Jr.</p> <p>22 Q. What happened to Harold Ford, Sr.?</p> <p>23 A. I am not familiar with his father. I 24 worked for Harold Ford, Jr. I know a little about his 25 father. His father was a congressman decades ago.</p>	<p style="text-align: right;">Page 76</p> <p>1 and you were going to have to take those job duties?</p> <p>2 A. That's very specific. No, I do not 3 remember anybody telling me that at all.</p> <p>4 Q. It's my understanding it actually came as 5 a bit of a surprise to you, correct?</p> <p>6 A. It depends on -- surprise, I am not sure 7 I can calculate that. I don't recall exactly how the 8 conversation went. If that's an added duty, I will 9 take it with stride, keep it moving and get the work 10 done.</p> <p>11 Q. It was an added duty for you, correct?</p> <p>12 A. Again, I will take it -- you know, I 13 don't think I -- the premise of the question was it an 14 added duty, I never -- the majority of my job, 15 particularly around DE&I encompasses a lot. There 16 isn't just one thing I do. I can't say I took it as a 17 surprise in that nature. DE&I work is not just one 18 specific thing you do and you are done with it. It 19 encompasses a lot. I don't think people understand.</p> <p>20 Q. Does it encompass things such as teaching 21 a class about how to make a slave? Is that something 22 your department would have been looking into and 23 concerned about?</p> <p>24 A. Let me make sure I heard the question. 25 Would my office be making an effort to have a lesson on</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. I will show you something else. I am 2 getting almost to the end. Do you recall any cases 3 against you by a company called Cash something or 4 another, Cash One?</p> <p>5 A. Not that I can recall off the top of my 6 head.</p> <p>7 Q. Do you recall being sued in general 8 sessions for, like, a loan shark, a pawn company or 9 someplace you go to get cash?</p> <p>10 A. Not that I can recall.</p> <p>11 Q. I may have asked you this. Do you know 12 how long your interviews lasted?</p> <p>13 A. I cannot recall.</p> <p>14 Q. Did you know Dr. Battle before you went 15 to work for Metro schools?</p> <p>16 A. I did not know Dr. Battle, not in any 17 type of professional way. I didn't.</p> <p>18 Q. When you first interviewed for this 19 position, was it your understanding that it would have 20 anything at all to do with School Choice?</p> <p>21 A. I don't recall. Again, it was two years 22 ago. I can't recall.</p> <p>23 Q. Do you recall anyone telling you when you 24 were interviewing for the position that they were 25 eliminating the position of director of School Choice</p>	<p style="text-align: right;">Page 77</p> <p>1 how to become a slave?</p> <p>2 Q. No, no. The question is different. If 3 Metro schools was teaching a class called How to Make a 4 Slave, is that something that your department would 5 step in to oversee?</p> <p>6 A. I think it would be my department along 7 with the -- I think a new department was formed, civil 8 rights division, I believe our chief of academics would 9 all take into that to figure out what's going on 10 because nothing happens in a silo. Those are the two 11 departments that come off the top of my head that would 12 be in that type of conversation if that type of lesson 13 plan was going on.</p> <p>14 Q. Were you aware that Metro schools made 15 national news because of a lesson taught at Waverly 16 Belmont called How to Make a Slave?</p> <p>17 A. I do not remember that. If I have seen 18 it, I haven't kept it in my memory bank recollection to 19 bring it up. I do not.</p> <p>20 Q. Mr. Hughes, assuming that it took place 21 before you were actually hired on at Metro schools, 22 assuming it took place in January of the year you were 23 hired, do you think someone at Metro schools should 24 have told you there was an issue with regard to 25 diversity, DEI, because this lesson was taught called</p>

<p style="text-align: right;">Page 78</p> <p>1 How to Make a Slave?</p> <p>2 A. I can't speak for what they should have</p> <p>3 told me or what I believe they should have told me. I</p> <p>4 don't think I had that conversation. I am not sure</p> <p>5 what the should have, could have, would have would</p> <p>6 actually look like. I am not certain that -- I don't</p> <p>7 believe it came up, but I am not sure how that would</p> <p>8 come up. I can't answer. I can't give you a quality</p> <p>9 answer for that question.</p> <p>10 Q. The question is a little different. You</p> <p>11 are executive director for DE&I at Metro schools?</p> <p>12 A. Correct.</p> <p>13 Q. If something like that occurred now, you</p> <p>14 need to be made aware of it, correct?</p> <p>15 A. I would believe I would be one of several</p> <p>16 people to be made aware of it.</p> <p>17 Q. If something like that happened that was</p> <p>18 so bad it made national news several months before you</p> <p>19 were hired on, should you have been told about it in</p> <p>20 your opinion, not anybody else's, but in your opinion?</p> <p>21 Should you have been told about it?</p> <p>22 A. I think I will be very clear outlining</p> <p>23 what my opinion is. You asked me under oath and I want</p> <p>24 to speak to facts. I cannot speak to facts what should</p> <p>25 have been told or shouldn't have been. I don't have a</p>	<p style="text-align: right;">Page 80</p> <p>1 A. I do not believe I had that conversation</p> <p>2 with anybody. I know that's not a national story that</p> <p>3 comes to my mind. I know recently I've seen other</p> <p>4 states that have gone through that, but I don't recall</p> <p>5 Nashville, per se, during that time.</p> <p>6 Q. Let me make sure I understand what you</p> <p>7 are saying for the record. Don't let me cut you off.</p> <p>8 Stop me if I do. Very short on this. You were not</p> <p>9 made aware of that lesson, and as the executive officer</p> <p>10 of DEI at Metro schools, you do not believe you should</p> <p>11 have been made aware of that lesson, correct?</p> <p>12 A. Definitely not correct. I did not say I</p> <p>13 shouldn't have been. I am telling you I did not have</p> <p>14 that information. I can't give you right now would</p> <p>15 that have been important right then to say this is</p> <p>16 something that needs to go -- and you are asking in my</p> <p>17 interview process or when I am coming to be hired on?</p> <p>18 Q. When you took over the position of DEI</p> <p>19 executive officer. Okay? All I am asking you is this</p> <p>20 something you think you should have been told about?</p> <p>21 Do you think as the executive officer of DEI you should</p> <p>22 have been told that there was an issue with regard to a</p> <p>23 student teacher teaching a class called Let's Make a</p> <p>24 Slave?</p> <p>25 A. I would definitely again go back and make</p>
<p style="text-align: right;">Page 79</p> <p>1 good answer for that question. I can only deal with</p> <p>2 the facts, not my opinion or what I think or hope to</p> <p>3 believe.</p> <p>4 Q. Mr. Hughes, you have been very, very -- I</p> <p>5 appreciate you being here today. I know depositions</p> <p>6 aren't the easiest thing, but I can ask you your</p> <p>7 opinion. You are the head of the department at Metro</p> <p>8 schools. What is your opinion? Should this have been</p> <p>9 brought to your attention when you stepped on at Metro</p> <p>10 schools?</p> <p>11 A. When did you say this report came out?</p> <p>12 Q. Late January of 2020 and you were hired</p> <p>13 on within a few months.</p> <p>14 A. Again, I can't speak to -- I don't know</p> <p>15 much about the case what went on, was it the right time</p> <p>16 or wasn't the right time. I do know I came in at the</p> <p>17 height of COVID and there was a lot going on at that</p> <p>18 time. So I don't know what was in the mind of others</p> <p>19 at that time as well. I can't speak to that. I don't</p> <p>20 believe having that conversation -- I'm not sure it</p> <p>21 would have guided the work I am doing right now if I</p> <p>22 had been informed of that or if I hadn't.</p> <p>23 Q. You were not informed of the Let's Make a</p> <p>24 Slave lesson and you are not sure you even should have</p> <p>25 been informed of it?</p>	<p style="text-align: right;">Page 81</p> <p>1 certain I would have all the context that you are</p> <p>2 saying right now. I don't want to say yes based off</p> <p>3 what I feel or think -- let me understand what you are</p> <p>4 really asking me in this question. I am not trying to</p> <p>5 be --</p> <p>6 Q. Let's go back and show you what was</p> <p>7 taught and ask you should you have been made aware of</p> <p>8 this. Can you see this, what I put up here, the</p> <p>9 writing I put on the board? It says Jane Doe versus</p> <p>10 Metropolitan Government of Nashville, Davidson County,</p> <p>11 Tennessee and Dr. Adrian Battle. You see that?</p> <p>12 A. I can.</p> <p>13 Q. This is my client's complaint she filed.</p> <p>14 We put in the paragraphs from the lesson that was given</p> <p>15 to the children at Waverly Belmont. Read paragraph 4.</p> <p>16 Tell me when you have the stuff on the screen read and</p> <p>17 I will move down for you.</p> <p>18 A. Start from line 14 on down?</p> <p>19 Q. Yeah. Read this.</p> <p>20 A. Okay.</p> <p>21 Q. I will go down.</p> <p>22 A. You went up a little quick. Okay.</p> <p>23 Q. Were you familiar with this thing called</p> <p>24 the Willie Lynch letter?</p> <p>25 A. I am familiar with that.</p>

<p style="text-align: right;">Page 82</p> <p>1 Q. Do you agree that this is -- what we put 2 in the complaint is dehumanized racial degradation? 3 Would you agree with that? 4 A. The Willie Lynch letter or the narrative 5 here Let's Make a Slave? 6 Q. The narrative. 7 A. I mean it's tough. Is this an excerpt 8 from the Willie Lynch letter? 9 Q. Yes. 10 A. You are telling me this was used as a 11 lesson plan? 12 Q. Yes. Mr. Hughes, my question to you is 13 this: You are stepping in to this executive officer 14 position at Metro schools of DEI and this Willie Lynch 15 narrative was just taught to some children that were at 16 Waverly Belmont in late January 2020. Would you have 17 wanted to know about this so you could have stopped 18 this from occurring? 19 A. Would it have helped me coming in to know 20 some of the things that were taking place? Would it 21 have been beneficial to say also this is going on? 22 Would it have been beneficial to know this was an 23 incident that had taken place in the schools? Possibly 24 so, yes, it would have been helpful to say this leads 25 to some of the issues we've had with some lessons</p>	<p style="text-align: right;">Page 84</p> <p>1 week, absolutely. We would be working with our other 2 departments to figure out, hey, what is taking place, 3 do our teachers have cultural competency to know when 4 and what to teach, how to teach it, what's responsible 5 and what's not responsible. We would have a kind of 6 what we do for students that need intervention and 7 help. We would try to work with the school to put 8 things in place to make certain the conditions are just 9 and equitable for all students and that we take into 10 consideration the teaching modules and understanding 11 social and emotional learning, all those things. 12 Q. Did you know that Jane Doe's son was in 13 this class? 14 A. I did not. I do now. 15 Q. Did you know her son suffers from 16 autistic? 17 A. I do not. I did not. 18 Q. Did you know that Jane Doe's son -- did 19 you know that Jane Doe complained about this lesson and 20 said it was a violation of Title 6? 21 A. I did not and do not. 22 Q. Did you know that within weeks of her 23 complaint about that she lost her job as director of 24 School Choice? 25 A. I did not and do not.</p>
<p style="text-align: right;">Page 83</p> <p>1 planned, but it wouldn't -- it would have been helpful 2 to know who else was in other areas to help me break 3 down what's actually going on. 4 A lot of things have a lot of context to 5 them. Thank you for sharing it. This is my first time 6 even reading this as part of a lawsuit to know what was 7 going on. Waverly Belmont is elementary, so I am 8 thinking of the grades that were in there. So it would 9 have been some insight for me to know what was going on 10 to say this is an incident we have, we're working to be 11 better as a school district. 12 Q. So the first time you have even read what 13 was taught at Waverly Belmont is today in your 14 deposition? 15 A. Yes. 16 Q. Would you agree with me this was not 17 appropriate for those children? 18 A. For that grade without any context, I 19 probably wouldn't recommend it for that grade if I am 20 in a mentorship organization or in schools. 21 Q. If you were to find out that a teacher 22 taught this class last week, would you have set up 23 something in your office to try to prevent it from 24 happening in the future? 25 A. I think if I found it happening last</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. Did anyone from Metro, not Metro legal, 2 but anyone from Metro contact you to find out exactly 3 how you came about to be hired as the executive officer 4 of DEI? 5 A. Has anybody at Metro public schools asked 6 me how I came to be hired for this role? Not that I 7 can recall. I mean not how did you get this job or -- 8 not that I recall, no. 9 Q. Have you heard anyone at Metro -- you may 10 or may not, but have you heard anyone make comments 11 about how Jane Doe cannot be hired into any particular 12 position because she has a lawsuit against the 13 district? 14 A. I have not heard that. Personally I have 15 not heard that. 16 Q. Do you oversee any of the -- do you make 17 recommendations to any of the principals, make 18 recommendations to any of the teachers about what to 19 teach in the classes? 20 A. Do I make recommendations to the teachers 21 about what to teach in the class? 22 Q. To the principals, to the teachers that 23 goes down through the line about what should be taught 24 in the classes? 25 A. Not to that extent what to be taught, no,</p>

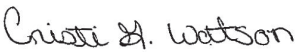
<p style="text-align: right;">Page 86</p> <p>1 ma'am.</p> <p>2 Q. So if you are not recommending what's to</p> <p>3 be taught, are you recommending what type emotional</p> <p>4 services to provide or counseling services?</p> <p>5 A. Let me tell you what I do to get all the</p> <p>6 disbelief and you don't have to ask me multiple</p> <p>7 questions. This is what I do provide for teachers in</p> <p>8 this phase. We work with teachers to make certain they</p> <p>9 understand foundational core elements of what equity</p> <p>10 looks like in school buildings and school rooms. We</p> <p>11 work with them to know that equity is not the goal. It</p> <p>12 is the vehicle by which we achieve our goals. We work</p> <p>13 with them to fully look and be reflective on their</p> <p>14 practices, their pedagogical practices in efforts to</p> <p>15 respect identity, respect the cultural wealth and</p> <p>16 assets of students. I work with our curriculum and</p> <p>17 instruction team to make certain that with the social</p> <p>18 studies team that we are using inclusive, diverse</p> <p>19 lesson planning, that all of their coaches and</p> <p>20 instructors go through DEI training, that they</p> <p>21 understand how everything links with our road map and</p> <p>22 how we are working to make certain that we -- as we</p> <p>23 talk about every student knowing what that looks like,</p> <p>24 how do we go about doing that, but I do not prescribe</p> <p>25 to any building director the lesson plans as to which</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Do you know what year you would have</p> <p>2 created this resume?</p> <p>3 A. Probably restructured around 2019 or</p> <p>4 2020.</p> <p>5 Q. Does this show you were working for the</p> <p>6 mayor's office in 2015 to 2018?</p> <p>7 A. To 2019.</p> <p>8 Q. Does this say 2015 to 2018?</p> <p>9 A. Yeah. That looks to be a mistake, yeah.</p> <p>10 Q. Here up above it says office of the mayor</p> <p>11 2015 to present?</p> <p>12 A. Okay.</p> <p>13 Q. Jobs for the mayor's office --</p> <p>14 A. No, no. Yeah, there was a point in time</p> <p>15 within the mayor's office that Mayor Briley appointed</p> <p>16 me to the chief Diversity, Equity and Inclusion officer</p> <p>17 title within itself again after we had gone through a</p> <p>18 study partnership.</p> <p>19 Q. So that occurred in the Briley</p> <p>20 administration?</p> <p>21 A. It did.</p> <p>22 Q. Did you have any discussions with Mayor</p> <p>23 Cooper about staying with that administration?</p> <p>24 A. I did not.</p> <p>25 MS. STEINER: Let's have your resume</p>
<p style="text-align: right;">Page 87</p> <p>1 they can and cannot teach.</p> <p>2 Q. Mr. Hughes, what is your current salary?</p> <p>3 A. I want to say, if I am thinking right</p> <p>4 now, 147.</p> <p>5 Q. Was it higher than that when you first</p> <p>6 got started?</p> <p>7 A. No, ma'am.</p> <p>8 Q. It's always been 147?</p> <p>9 A. No. I think it was a little bit lower</p> <p>10 than that.</p> <p>11 MS. STEINER: That is all the questions I</p> <p>12 have. I appreciate your patience.</p> <p>13 MS. HARBISON: Dr. Hughes, I think I have</p> <p>14 just a few questions. Can we take a five minute break</p> <p>15 before we get into --</p> <p>16 THE WITNESS: Yeah. I want to correct</p> <p>17 the record as well. I am not a doctor. I never said I</p> <p>18 am a doctor.</p> <p>19 MS. HARBISON: Sorry. That's my bad.</p> <p>20 (A break was taken.)</p> <p>21 BY MS. STEINER:</p> <p>22 Q. One more question. Mr. Hughes, do you</p> <p>23 recognize this document I am showing you?</p> <p>24 A. Scroll up. Yeah, probably looks to be a</p> <p>25 resume.</p>	<p style="text-align: right;">Page 89</p> <p>1 marked next numbered exhibit.</p> <p>2 MR. FOX: No objection.</p> <p>3 (Exhibit No. 4 was marked.)</p> <p>4 * * * * *</p> <p>5 EXAMINATION</p> <p>6 BY MS. HARBISON:</p> <p>7 Q. I have a few questions. My name is Jesse</p> <p>8 Harbison. I represent Dr. Damon Cathey in this case.</p> <p>9 Would you have had the option to stay with the mayor's</p> <p>10 office if you had wanted to?</p> <p>11 A. I am going to answer that question best I</p> <p>12 know it. Probably not. Probably not.</p> <p>13 Q. Why not?</p> <p>14 A. Two different mayors, different -- I</p> <p>15 believe this mayor didn't believe in some of the work</p> <p>16 we were doing and wanted to go his own direction. I</p> <p>17 believe, like many in the office, it was amicable to</p> <p>18 keep moving forward in other opportunities.</p> <p>19 Q. Tell me more about what you mean by the</p> <p>20 mayor not being aligned with some of your beliefs. I</p> <p>21 believe that's what you said.</p> <p>22 A. No, I think it was different.</p> <p>23 Q. Tell me what I got wrong.</p> <p>24 A. It came from two mayors really focused on</p> <p>25 DE&I work, diversity, equity, how we are getting in the</p>

<p style="text-align: right;">Page 90</p> <p>1 communities and I believe -- I am not fully certain 2 everything this mayor wanted to do, but I believe he 3 wanted to go his own direction, not just follow with 4 what the past two mayors had been working on 5 previously.</p> <p>6 Q. What direction was that?</p> <p>7 A. I don't fully know. I haven't fully 8 vetted or gone all the way with the mayor to figure out 9 which direction he fully wanted to go. It was obvious 10 that the DE&I space within my role wasn't -- or with a 11 lot of roles in the administration wasn't where he 12 wanted to go. He wanted to come in and make his own 13 footing as mayor, not just follow up on the work we 14 began with Mayor Barry and Mayor Briley.</p> <p>15 Q. Why was that obvious to you? What 16 happened that made that obvious to you?</p> <p>17 A. The election, going through the campaign. 18 It was definitely obvious that he was going to go in a 19 different direction than many of the staff that were 20 already in there. For the most part, when a mayor 21 comes in, they bring in the people as they go through 22 their vetting process as they build up their team to 23 identify who they want to come into the office. For 24 the most part they bring their own teams with them to 25 be in alignment with their vision.</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. You haven't engaged in any socialization 2 with anyone in two years?</p> <p>3 A. Not a lot, not outside of work and 4 mentorship organization. It's definitely not been the 5 same as prior to COVID because I have two small 6 children.</p> <p>7 Q. You said something earlier about your LLC 8 and the person helping you with taxes -- tell me if I 9 am wrong about this -- something about you can't find 10 where the LLC is; is that correct?</p> <p>11 A. No. My tax person's name is Taneka 12 Jackson (phonetic spelling). As I was calling to get 13 my taxes uploaded, I know that I was in a crew where I 14 owed my filing fee for at least this past year and was 15 going through the process of taking care of that. And 16 as I was talking with the state, they said they could 17 not find my control number. I had to send paperwork 18 and information in to them. I am waiting to hear back.</p> <p>19 Q. Where do you believe your LLC is 20 registered, in what state?</p> <p>21 A. Only state I am registered in is 22 Tennessee.</p> <p>23 Q. What paperwork did you send to the state 24 after you learned they could not find your control 25 number?</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. Did you know Freda Player-Peters before 2 you began working for MNPS?</p> <p>3 A. Yes.</p> <p>4 Q. How did you know her?</p> <p>5 A. I've known Freda in my time working with 6 the democratic party, working with the labor unions 7 throughout the years.</p> <p>8 Q. About how long have you known her?</p> <p>9 A. I have known Freda since about 2005, 10 2006.</p> <p>11 Q. Did you talk to her about coming to work 12 for MNPS?</p> <p>13 A. I don't fully recall. I value Freda's 14 opinion, so I might have asked her thoughts about it, 15 but I don't fully recall a full vetted out 16 conversation.</p> <p>17 Q. She was on the school board when you 18 applied for the job that you currently hold, correct?</p> <p>19 A. I believe so.</p> <p>20 Q. Do you socialize with Freda 21 Player-Peters?</p> <p>22 A. I haven't socialized with anyone over the 23 last two years because of COVID. In the past we have 24 been definitely friends and socialized and engaged in 25 organizing, so definitely so.</p>	<p style="text-align: right;">Page 93</p> <p>1 A. It was documentation from the secretary 2 of state's office that had my control number, that had 3 all my information, LLC, address, things of that 4 nature.</p> <p>5 Q. Are you familiar with the fact that the 6 board promulgates certain personnel policies for MNPS 7 employees?</p> <p>8 A. Not fully. Some, but not fully.</p> <p>9 Q. So would it follow logically that you are 10 not familiar with conflict of interest policies 11 promulgated by the board for MNPS employees?</p> <p>12 A. I think I know it vaguely but not well 13 enough to sit here and spit it out to you verbatim or 14 in a good framework.</p> <p>15 MS. HARBISON: Those are all my questions. 16 Thank you.</p> <p>17 * * * * *</p> <p>18 FURTHER EXAMINATION</p> <p>19 BY MS. STEINER:</p> <p>20 Q. Can I ask a couple more. Mr. Hughes, for 21 your LLC do you have an EIN number?</p> <p>22 A. I do have an EIN number.</p> <p>23 Q. When did you get the EIN number?</p> <p>24 A. I got the EIN number 2019, end of 2019, 25 2020.</p>

Page 94

1 Q. Did you say then your LLC was a limited
2 liability company then?
3 A. I did.
4 Q. When you entered into the contract with
5 Bloomberg, did you say it was an LLC?
6 A. I did.
7 Q. You have an EIN number, you had one for
8 the entity ever since it's been created, correct?
9 A. That is correct.
10 Q. So the income comes to the Blueprint
11 Solutions, as opposed to you personally, correct?
12 A. The only income that has come to me since
13 ending with Bloomberg was a \$1,000, what do you call
14 it, honorarium for being on a panel speaking with the
15 Educators Cooperative.
16 MS. STEINER: That's it. Thank you.
17 MR. FOX: Nothing from me.
18 (DEPOSITION CONCLUDED.)
19
20
21
22
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Page 95

1 REPORTER'S CERTIFICATE
2 STATE OF TENNESSEE)
3 COUNTY OF DAVIDSON)
4 I, Cristi G. Watson, Licensed Court Reporter in and
5 for the State of Tennessee, do hereby certify that the
6 foregoing proceedings were stenographically reported by me on
7 the 11th day of April, 2022, and that the foregoing transcript
8 constitutes a true and accurate record to the best of my
9 ability.
10 I further certify that I am not related to nor an
11 employee of counsel or any of the parties to the action, nor
12 am I in any way financially interested in the outcome of this
13 case.
14 I further certify that I am duly licensed by the
15 Tennessee Board of Court Reporting as a Licensed Court
16 Reporter as evidenced by the LCR number and expiration date
17 following my name below.
18 IN WITNESS WHEREOF, I have hereunto set my official
19 hand on this 24th day of April, 2022.
20
21 
22 _____
23 CRISTI G. WATSON
24 Tennessee License No. 187
25

Exhibits	2005 30:11 31:25 38:18 39:9 40:8 48:11,14 91:9	6
Exhibit 1 29:11,18,22	2006 38:18 39:9 40:8 42:24 48:9 91:10	6 84:20
Exhibit 2 61:7,8	2007 63:1	8
Exhibit 3 63:10,12	2008 48:10,14	8 61:22
Exhibit 4 89:3	2010 49:5	9
\$	2015 50:19 88:6,8,11	99 33:5
\$1,000 94:13	2017 50:22	A
\$100 19:14	2018 8:22 50:22,23 88:6,8	absolutely 25:24 26:2 44:6,7 65:12 72:9 84:1
\$15 19:18	2019 19:1 20:11 51:4,7 52:18 53:18 54:3,6 59:14,19 88:3,7 93:24	academics 31:24 77:8
\$20 19:15	2020 17:25 28:9,13 52:13 54:9,14 79:12 82:16 88:4 93:25	accepted 28:22,23
\$500 19:14,17,22	2021 27:15 54:11 58:21,24 59:4	accident 42:11
1	2022 59:10	account 57:1
1 29:11,18,22	24 40:11	accurate 52:5,7 68:12,13,14,17
1.5 71:18	25 62:4	accurately 64:10 67:2
100 21:16	25th 62:8	achieve 86:12
11 59:9	27 28:9,13,16	acronym 69:8,12
113 6:18 40:16	28 28:21,22	actively 21:21
14 81:18	2:40 28:16	ACTS 12:13
147 87:4,8	3	added 76:8,11,14
18 62:23	3 63:10,12	additional 71:18
19 36:5	30 19:4 64:20	address 40:16 93:3
1978 61:22	37214 6:21	administered 65:25
1997 30:7,11 31:25	4	administration 49:17 88:20,23 90:11
1998 33:3	4 44:24 81:15 89:3	administrative 31:1
1999 43:4	4.O 45:13,24	Adrian 81:11
2	40 19:4 64:20	advocate 70:2
2 61:7,8	40-minute 64:17	agencies 70:21
2.5 44:24 46:9,11	5	ages 6:24,25
20 36:5,22	5 28:3	agree 82:1,3 83:16
20-something 32:5	5th 27:15	airport 41:11,12,15,19
2000 20:5		alcohol 39:11
2004 42:24 62:4,8		

align 70:11	audio 14:15 22:20	Blueprint 52:17,20,22,24 53:6 54:2,7, 15 57:3,11 58:14 59:15,20 60:1,5,11, 14 63:15,16 94:10
aligned 89:20	autistic 84:16	board 81:9 91:17 93:6,11
aligning 70:10	average 46:5	bond 40:7
alignment 90:25	aware 5:23 21:16 45:23 66:11 77:14 78:14,16 80:9,11 81:7	bonded 40:11
alive 34:11		bottom 26:13,21
allegation 74:20	B	bought 36:4
amicable 89:17		boys 6:25 65:7
Ann 5:15	bachelor's 44:19 46:25	branding 52:3
annual 55:23	back 6:7 10:19,21 15:23 18:17 19:5, 12 22:6 24:17 25:23 30:21 32:5 34:20 35:8,9 41:19 42:6 45:2,6,11 46:7 48:1 49:13 52:10 55:23 56:3 57:5 60:4 62:11,18 64:1 72:1 73:4 74:1 80:25 81:6 92:18	break 83:2 87:14,20
anyplace 20:10	background 17:18 34:24 44:9 72:15	Briley 51:1,6 88:15,19 90:14
Anytime 5:17 60:8	backyard 34:2,7	bring 77:19 90:21,24
application 10:18 26:1,4 27:16 29:7 43:13	bad 78:18 87:19	broken 37:12,13,25
applications 10:5,10	Bailey 5:19	brought 49:17,21 79:9
applied 9:6,7,9 24:21 26:17 28:4,6 59:19 63:14 91:18	bank 77:18	brown 18:7 66:11
apply 7:23 8:13,15 9:12,20 11:21 15:25 26:6 27:1	Barnes 22:15 23:5,11,16,24 24:8,10, 13	budget 71:22
applying 10:15 17:6	Barry 50:4,7,14,16,17,18,19 90:14	build 49:24 90:22
appointed 88:15	Barry's 48:24 72:17	building 70:16 71:2 86:25
approximate 18:15,17	based 12:8,22 81:2	buildings 86:10
approximately 28:18	basis 10:9 55:23	bunch 6:5
April 16:9,10 59:9 60:3	Battle 67:15 72:14 75:14,16 81:11	business 54:25
areas 18:9 83:2	began 59:23,24 90:14 91:2	buy 36:1
argument 33:10	begin 24:9	
arrest 37:9	beginning 50:22 52:9	calculate 76:7
arrested 37:7	beliefs 89:20	calendar 22:6 24:17 25:16 66:15 67:24
Ashford 5:1,7 21:15 26:17 53:2 54:23 61:19	Belmont 77:16 81:15 82:16 83:7,13	caliber 35:22
asks 55:11 57:6	beneficial 82:21,22	call 5:16 16:20,23 17:20,22 31:2 33:9 53:8 94:13
assess 20:4	benefit 14:7 70:20	called 56:11 57:3 75:3 77:3,16,25 80:23 81:23
assessment 19:21,24	birth 61:22	calling 92:12
assets 86:16	bit 31:21 47:23 54:10 64:21 76:5 87:9	campaign 47:15 48:19 49:7,12,13 60:2,7 73:20 90:17
assuming 48:8 77:20,22	black 18:6 66:10	campaigns 73:21
attempted 14:2 33:12	Bloomberg 16:21 17:13,15 18:3,23, 24,25 19:23 20:9,19 51:9 54:6,8,14 59:24 60:2,7,21,22 73:20 94:5,13	candidate 28:22
attend 30:10 31:19 32:1 68:9,11	blow 62:15	care 92:15
attention 79:9		
attorney 5:16		

career 72:20	circumstances 38:15	CONCLUDED 94:18
Carolina 49:7 73:2	civil 77:7	conditions 70:4,19,21,22 84:8
Carrabba's 47:13,24 48:3,6	claim 42:17 57:10	conflate 53:23 54:21
carried 34:12	claimed 57:13	conflict 93:10
carry 34:15	claiming 57:12	confused 23:1
carrying 35:11	claims 5:22	congressional 49:7 73:1
Carter 30:2	class 35:2 76:21 77:3 80:23 83:22 84:13 85:21	congressman 74:25
case 79:15 89:8	classes 85:19,24	connect 66:4
cases 75:2	classroom 70:16	connected 7:4 62:10 70:1,17
cash 75:3,4,9	classrooms 66:3	connotation 74:2
casual 61:25	Clay 16:10 17:4,24 20:24 21:10,16,20, 23 22:1,19,23 23:2,13,20,25 24:5,11, 25 26:5 72:11,12	consent 62:9
catch 33:17	clear 6:10 59:25 78:22	consideration 28:8,14 84:10
Cathey 5:21 89:8	Clerk 61:15	consultant 52:17
caused 37:9 74:16	client 63:18	consulting 53:1 54:19 61:2
cell 40:21,22,23	client's 81:13	contact 17:3 64:1,11 85:2
certificated 69:16	clients 53:4 54:10	contacted 49:11
changed 28:8,13 52:10	closely 65:23	contacting 50:10
charge 10:16 11:11 38:1 39:13	coaches 65:15 67:18 86:19	context 81:1 83:4,18
charged 35:11 36:12,15,17,20 38:3 39:8,16,18,21 61:24 62:9,20	college 11:7 12:7 30:8	continue 67:23 72:3
charges 38:7,9,12 43:17 44:13	column 27:23	contract 18:14,18 19:3,4,8,13 20:8, 17,23 59:24,25 60:4 94:4
check 61:14	comfortable 14:6	contractor 60:6
checking 37:16	comments 85:10	contracts 53:15
chief 15:6 22:9,10,14,16 67:17,20 77:8 88:16	communication 17:23	contractual 18:21
chiefs 65:23	communities 18:7 66:10,11 74:5 90:1	control 92:17,24 93:2
child 8:20 11:22 13:15,22,24 14:3,13	community 12:3 49:10,24 74:7,11	conversation 44:8 64:18 72:2,8 76:8 77:12 78:4 79:20 80:1 91:16
children 6:22 10:4 81:15 82:15 83:17 92:6	company 57:3,17,19 61:5 75:3,8 94:2	conversations 44:20
choice 10:8 11:11 14:10 15:4,8,9,12, 17,21,24 64:23 66:20 75:20,25 84:24	compared 12:13 13:5	convicted 41:3 43:3 61:25 62:5 63:1
choices 11:20	competency 84:3	conviction 37:4
choose 14:11	complained 84:19	Cooper 88:23
chose 14:11	complaint 81:13 82:2 84:23	Cooperative 53:21 54:12 56:12 94:15
Chris 22:15 23:5,11,16,24 24:8	computer 40:19	core 86:9
Christiansen 6:16	concepts 73:6	correct 8:22 9:7,16 12:19 13:16 16:24 21:5 23:24 26:19,23 34:13 35:12 40:16 41:4,8 43:11,13 45:10 46:4 49:17 52:5 54:5 55:5,19 56:5,19 58:6, 21 59:13,16,21 60:8,13 61:20 62:3 63:1 68:21 69:9,14,15,17 73:12,21,24
Circle 6:19	concerned 76:23	
circles 21:14,18	concerns 69:2	

74:14 76:5,11 78:12,14 80:11,12
87:16 91:18 92:10 94:8,9,11
corrected 31:5
correspond 45:1
correspondence 28:7
corresponds 45:4,8 46:11
costs 72:2
counseling 86:4
County 38:10 41:6 61:14 81:10
couple 22:11,24 40:6 48:7 69:25
93:20
courses 30:12,20
court 6:9 29:12,17 61:15
Courtney 60:22
COVID 10:11 79:17 91:23 92:5
create 70:19
created 88:2 94:8
Creek 11:8,13
crew 92:13
criminal 36:13 38:9,12 43:17,21 44:3,
13 61:14
criminally 38:3
cultivate 70:13,14
cultivated 65:17
cultivating 18:6 71:2
cultural 84:3 86:15
cumulative 46:8
current 87:2
curriculum 86:16
Curtis 32:21 33:4,10
cut 80:7

D

damage 38:23
Damon 5:21 89:8
date 14:14 25:9,12,17 27:17 28:3,18
53:18 54:3 58:19 59:9,14,18,19 61:22
73:4

dates 27:24 29:8
Davidson 41:6 61:14 81:10
day 40:10 67:22
DE&I 18:6 65:16 73:7 76:15,17 78:11
89:25 90:10
deadline 68:4
deal 12:16 79:1
dealing 50:9
dealings 63:20
death 34:15
decades 31:10 37:14 74:25
December 61:22
decide 13:21
decision 8:1,3 10:24 11:10 12:17,22
68:10
deep 10:12 25:15 32:6 72:7
defender 42:22
definitive 31:22
degradation 82:2
degree 44:19 47:1,3
dehumanized 82:2
DEI 69:5,6,8,11,24 77:25 80:10,18,21
82:14 85:4 86:20
democrat 21:12
democratic 21:7,10,14,17,18,21
47:16 49:9 72:24 73:24 74:4,9 91:6
department 41:24 65:22 66:22
71:17,19,21 76:22 77:4,6,7 79:7
departments 65:21 77:11 84:2
depends 76:6
deposition 5:8 29:12,17 63:10 83:14
94:18
depositions 79:5
desks 9:24
details 24:19,20 27:24
developed 65:17
development 49:22
died 32:20
dig 10:12 25:15 32:6

direct 70:2
direction 41:19 89:16 90:3,6,9,19
directly 11:3 43:14 55:7 65:5 70:1,10,
16 72:11,13
director 49:6 72:23 73:2 75:25 78:11
84:23 86:25
disbelief 86:6
disclosed 59:10
discrimination 5:22
discussions 88:22
dissolved 60:2
distortion 14:15 22:20
district 53:24 71:4 83:11 85:13
diverse 86:18
diversity 15:2,6,13,15 16:1,2 26:18
52:12,16 54:17 65:5,14 68:19,24 69:1,
10,22 70:3 71:6,16 72:15,21,24 73:3
77:25 88:16 89:25
division 77:8
doctor 87:17,18
document 51:17 55:9,11,13,16,20
56:4,18 61:13,17 62:1,12 87:23
documentation 93:1
documents 59:3
Doe 5:16,17 8:17 63:18,21,25 81:9
84:19 85:11
Doe's 84:12,18
dollars 20:1 56:16 57:4,10 58:6 59:11
71:9,25
drink 38:20
drinking 38:18
driver's 41:1 62:21
driving 38:17 39:10 62:5
drugs 34:4
DUI 38:7,17,18 39:6,9,12,18 40:8
41:6,16 42:24 43:20 44:3 62:4,15,25
DUIS 38:13,16,17
duly 5:2
duties 76:1
duty 76:8,11,14

<hr/> <div>E</div> <hr/> <p>e-mail 40:24</p> <p>earlier 20:19 24:1,12 46:12 58:10 59:22 60:6 64:25 66:5 92:7</p> <p>early 16:10 72:4 73:5</p> <p>earned 55:18 56:25</p> <p>easier 69:13</p> <p>easiest 79:6</p> <p>education 13:24 14:4 45:12 73:18</p> <p>educational 44:16</p> <p>educators 53:21 54:12,16 56:11 65:18 67:7 70:16 94:15</p> <p>effort 76:25</p> <p>efforts 86:14</p> <p>EIN 93:21,22,23,24 94:7</p> <p>election 51:3 74:19 90:17</p> <p>electoral 74:10</p> <p>elementary 7:3 83:7</p> <p>elements 73:3 86:9</p> <p>eliminating 75:25</p> <p>else's 78:20</p> <p>emotional 84:11 86:3</p> <p>empirically 12:12</p> <p>employee 54:23 65:2</p> <p>employees 53:13 60:12 64:14 65:1 69:3 93:7,11</p> <p>empower 74:5</p> <p>empty 9:24,25 10:2</p> <p>encompass 76:20</p> <p>encompasses 69:6 76:15,19</p> <p>end 22:25 24:16 29:15 56:23 75:2 93:24</p> <p>ending 94:13</p> <p>engage 74:5</p> <p>engaged 70:18 91:24 92:1</p> <p>engagement 53:21 54:4,12,13</p> <p>enrichment 66:7</p>	<p>entered 94:4</p> <p>entire 72:20</p> <p>entity 52:25 53:10 55:8 56:17 67:21 94:8</p> <p>entry 10:9</p> <p>equate 73:7</p> <p>equitable 84:9</p> <p>equity 15:2,7,15 16:2 26:18 49:22,24 52:12,17 54:18 65:5,14,15,17,20,22, 24 67:4,8,18,24 68:19,24 69:1,11,22 70:3 71:6,16 72:4,15,21,25 73:3 86:9, 11 88:16 89:25</p> <p>escalated 37:17</p> <p>ethically 54:22 56:5 57:1</p> <p>ethics 56:9</p> <p>Evans 32:18 33:2,19</p> <p>events 27:20,22,23,24</p> <p>Eventually 64:1</p> <p>exact 39:24</p> <p>EXAMINATION 5:3 89:5 93:18</p> <p>excerpt 82:7</p> <p>exchange 61:25</p> <p>executive 15:1,12 16:1 21:20 26:18 52:12 65:4,13 78:11 80:9,19,21 82:13 85:3</p> <p>exhibit 29:11,16,18,22 61:7,8 63:10, 12 89:1,3</p> <p>exist 53:7,8</p> <p>experience 52:11</p> <p>explained 64:18</p> <p>express 74:7</p> <p>extended 31:25</p> <p>extent 85:25</p> <p>externally 67:6</p> <p>extra 44:19</p> <hr/> <div>F</div> <hr/> <p>faces 23:18</p> <p>fact 93:5</p>	<p>factions 49:10</p> <p>facts 78:24 79:2</p> <p>factual 10:13 45:17,21 46:2,3</p> <p>factually 45:10 62:3</p> <p>fair 9:12 68:5</p> <p>faith 66:10</p> <p>fall 15:23</p> <p>false 25:24 59:22</p> <p>familiar 74:23 81:23,25 93:5,10</p> <p>families 10:8 11:20 14:21 66:24 68:4, 6</p> <p>family 11:9 60:16 66:21 70:15</p> <p>farther 43:2</p> <p>father 74:23,25</p> <p>fee 92:14</p> <p>feel 12:9 70:17 81:3</p> <p>felony 43:3</p> <p>field 49:6 73:2</p> <p>figure 13:9 14:7 45:20 48:21 77:9 84:2 90:8</p> <p>file 55:9,10,22 56:3,22 58:1,18 60:14</p> <p>filed 27:17 43:17 56:1 57:2,14,25 58:2,17 59:12 60:16 81:13</p> <p>filing 92:14</p> <p>fill 26:1</p> <p>filled 26:3,4 27:1 57:6</p> <p>final 24:15</p> <p>finalizing 66:19 67:7</p> <p>find 14:5 25:16 53:10 57:22,24 83:21 85:2 92:9,17,24</p> <p>finished 54:5</p> <p>fired 47:4 49:3</p> <p>firm 53:1 54:19 61:2</p> <p>flag 31:23</p> <p>fluke 33:8,9</p> <p>flunk 30:12,14</p> <p>flunked 30:20,24 34:17 35:2</p> <p>focused 67:6 89:24</p>
---	---	---

follow 90:3,13 93:9	gathering 58:3	handle 72:16
followup 45:19	gave 58:9 64:4	handling 64:24
footing 90:13	general 11:15 75:7	Hank 16:10 17:3 20:24 21:10,16,20, 23,25 22:18,22 23:1,13,20,25 24:4,25 72:11,13
force 49:22	get all 32:6 53:20 86:5	happened 29:6 62:22 74:22 78:17 90:16
Ford 47:14 48:12,18 73:6 74:3,8,14, 17,18,21,22,24	girls 65:7	happening 83:24,25
form 46:15 57:2,6,25 58:8,12,24,25 59:1,7	give 9:22 10:12 13:13,24 14:3 18:2 19:20,24 20:3 24:19 54:17 55:3 56:10 64:5,6 78:8 80:14	Harbison 5:20 87:13,19 89:6,8 93:15
formalized 67:18	Givens 57:21	hard 62:12
formed 77:7	giving 46:3 56:12 64:21	Harold 47:14 48:12,18 73:5 74:3,8,14, 17,18,21,22,24
forms 58:17	glasses 27:6,7	hate 17:21
forward 89:18	goal 73:24 86:11	head 8:7 11:25 12:15 16:19 22:5 23:22 24:3 25:15 30:15,25 42:3 48:22 59:8 75:6 77:11 79:7
found 83:25	goals 71:16 86:12	headed 41:11
foundational 86:9	good 12:6 26:11 79:1 93:14	hear 5:17 6:1,2 92:18
FOX 29:21 46:15 61:9 63:11 89:2 94:17	government 55:2,3,5 81:10	heard 10:1 71:17 76:24 85:9,10,14,15
framework 93:14	GPA 44:24	height 79:17
frameworks 70:13,14	grade 8:21,23,25 12:18 46:5 83:18,19	helped 82:19
Freda 91:1,5,9,20	grades 31:3 35:2 83:8	helpful 64:3 82:24 83:1
Freda's 91:13	grading 45:20,24	helping 92:8
friend 32:13,14,16 33:10,11,13,14,19	graduate 30:5	hey 12:25 72:3 84:2
friend's 32:18,21 34:2	great 57:25	hide 44:8
friends 13:20 21:4 40:6 91:24	Griffin 22:17 23:6,12,16,25 24:9,10, 13	high 11:6 12:1 30:1,2,5 44:18
front 9:10,15 11:3 25:19 27:2 31:13 32:4 39:13,25 42:7 45:16 56:13 58:19	group 24:10 52:18,20,23,24 53:6 54:2,8,15 56:11 57:3,11 58:8,15 59:20 60:5,11,14	higher 46:1 87:5
frozen 5:25	groups 56:14 67:5 71:13	highway 41:12,21
FTES 72:2	growth 67:11,12	Hillsboro 11:14
full 5:5 14:9 18:14,17 31:22 56:4 72:7 91:15	guess 33:9 39:11	Hillwood 11:14
full-time 18:19,20 65:1	guided 79:21	hire 42:19 71:19
fully 40:12 62:2 86:13 90:1,7,9 91:13, 15 93:8	guilty 36:25 37:21	hired 15:12 21:19 48:23 49:1,3,4,5,18 59:15,20 73:1 77:21,23 78:19 79:12 80:17 85:3,6,11
funding 71:8,10,11,15,18	gun 32:13,14,20 34:13,15,21 35:21, 22,24,25 36:2,3,13 37:1,17	hit 38:21 42:1,4
funds 55:4,6 72:6	gunpoint 33:21 34:1	Hmm 23:3
future 83:24	guns 34:18,21 36:7	hold 91:18
	guy 51:20	home 34:8 40:22 41:19
		homes 34:3
<hr/>		
G	<hr/>	
	H	
<hr/>		
galvanizing 74:11		
gang 33:6	hand 62:12	

honest 18:2 19:20,24 20:3 31:10 35:8
40:1 44:5,23

honorarium 94:14

hope 79:2

hour 19:14,15,17,18,22 20:2,5

hourly 19:7,9,10,11

hours 18:22 19:2,4 40:6,12 67:22

household 13:8

HR 22:9,14 55:16 56:18 59:1

Hughes 5:1,7,23 6:4,16 26:17 29:1,24
54:24 61:19 63:14 77:20 79:4 82:12
87:2,13,22 93:20

Hull 7:21

hurt 41:25

HVCUS 66:10

I

I-40 41:13,15

idea 10:18 19:15

identified 13:23

identify 14:3 90:23

identifying 13:18

identities 70:18

identity 86:15

impact 69:7

implements 9:18

implied 62:9

implying 64:6

important 80:15

incident 82:23 83:10

incidents 32:22

included 23:8

includes 34:24

inclusion 15:2,7,13,15 16:2 26:18
49:25 52:12,17 54:18 65:5,14 68:20,
24 69:2,11,23 70:3 71:6,16 72:16,21,
25 73:4 88:16

inclusive 86:18

income 53:17 54:2,10 55:7,19 56:7

57:10 58:21 59:16,21 60:15,16 94:10,
12

incorrect 73:25

increase 65:20 70:7

Indiana 57:22

individuals 22:12 23:9 24:4

influence 39:10,15

information 9:10,14 10:23 11:3,24
12:14 19:6 26:25 27:11 31:13,23 32:6
35:9,10 40:15 43:15 45:3,7,16 46:4,10
52:1 60:17 64:4,7 67:1 74:6 80:14
92:18 93:3

informed 79:22,23,25

innovation 22:10

innovations 22:16

ins 44:21

insight 46:14 63:23 64:21 83:9

institutions 46:1

instruction 86:17

instructors 86:20

insurance 42:14

interaction 73:17

interest 93:10

interested 16:7 17:6,10 49:12

internally 67:5

interning 48:12

interruption 5:24

intervention 84:6

interview 15:18,20,24,25 16:15 20:25
23:5,10,11,12,15,20,23 24:2,6,10,14
25:1,3,10,13,18 29:8 34:19 80:17

interviewed 23:2 24:22 25:22,24
75:18

interviewing 16:7 22:18,22 75:24

interviews 22:3,7,25 23:7,8 24:5,8,15
25:25 75:12

introduction 63:23

invocation 46:3

involve 74:5

involved 5:12 21:21 42:11 45:25

issue 77:24 80:22

issues 82:25

J

Jackson 7:21 92:12

jail 39:24 40:2,5,9

James 5:19 32:18 33:19

Jane 5:16,17 8:17 63:18,20,25 81:9
84:12,18,19 85:11

January 77:22 79:12 82:16

Jesse 5:20 89:7

job 15:1,3,6,17,21,25 16:3,6 18:10,19
22:4 24:22 26:17 27:1 28:18 47:4,7
51:11,13 64:8,10,18 67:21 76:1,14
84:23 85:7 91:18

jobs 47:11 48:15,16 73:13 88:13

join 73:23 74:4

journey 72:4

Jr 32:19 33:19 47:14 48:12 73:6 74:3,
17,18,21,24

Jr.'s 48:18

July 54:9

June 52:13 54:9

K

key 70:15

kicked 30:17,18,19

kid 67:2

kids 9:20 11:2,6 12:6 13:18 68:6,9,11

killed 32:13,14,23 33:2,4,10,11

kind 62:12 84:5

kindergarten 9:2,6

kitchen 47:19

knee 72:7

knew 16:11 21:5 34:10,11

knowing 86:23

knowledge 15:3 71:2

Knox 38:10

Knoxville 13:13 29:25 32:14,25 33:23,25 36:2	links 86:21	manage 11:19 14:19
<hr/>	list 64:14	managed 63:24
L	listening 29:2	manager 28:9
<hr/>	literally 23:4	manages 7:10 9:17
labor 49:23 73:8,9 91:6	live 6:17,18 12:3 25:4	managing 49:13
lady 33:11	lived 41:20	map 65:18 67:8,19 86:21
lady's 57:20	living 65:22	March 60:3
language 31:9	LLC 52:18,20,23,24 53:23 54:3,25 56:21 58:15 60:1,14,18 92:7,10,19 93:3,21 94:1,5	marijuana 38:8 39:12,14,16,19,22 42:25 43:21 44:3
large 49:13	loan 75:8	mark 61:6
lasted 75:12	located 60:24,25	marked 29:11,16,22 61:8 63:10,12 89:1,3
late 60:3 79:12 82:16	logically 93:9	marking 29:13,17
lawsuit 5:12 39:3 83:6 85:12	long 6:6 17:24 20:13 48:5 51:2 75:12 91:8	married 6:13
lawyer 42:19,22	longer 37:15	master's 46:24 47:1,3
leaders 67:16	looked 13:11 40:1	mayor 49:16 50:8 51:1 72:17 88:10, 15,22 89:15,20 90:2,8,13,14,20
leadership 18:6	lost 84:23	mayor's 50:7,8,9,12,19 51:5 55:14 59:18 73:18 88:6,13,15 89:9
leading 24:14	lot 9:12 18:7 24:18 28:3 45:25 49:23 69:6 76:15,19 79:17 83:4 90:11 92:3	mayors 89:14,24 90:4
leads 82:24	lottery 7:7,9,23 8:13,16 66:19	Mcgavock 12:4,5
learned 92:24	lower 87:9	Meaning 69:1
learning 14:10 67:16 84:11	Lynch 81:24 82:4,8,14	means 5:18 28:11 43:10 70:6
leave 31:2,4,6 51:5 74:16	<hr/>	measures 67:10
Leffler 5:20	M	meet 67:17,25
left 48:5,11,18 54:13 59:18 74:18	<hr/>	meeting 16:9,15,16 17:25 67:14,15, 18
legal 85:1	machine 39:6 62:15	meetings 67:16 68:1,3
legalities 62:17	made 8:3 10:24 12:17,22 19:22 52:5 53:17 59:15,21 61:3 71:22 77:14 78:14,16,18 80:9,11 81:7 90:16	Megan 48:24 49:11,21 50:2,4,7,13,16, 17,18,19 72:17
lenses 65:24	main 13:8 48:15 50:13 64:24	member 21:9,11
lesson 76:25 77:12,15,25 79:24 80:9, 11 81:14 82:11 84:19 86:19,25	major 71:8,10,11	members 21:7
lessons 82:25	majority 76:14	memory 77:18
letter 81:24 82:4,8	make 6:9 8:1 10:1 15:5 45:15,16,18, 21 46:2,8 56:5,21 65:16,18,21 66:11, 19,20,22,24 67:9 68:10 69:21 70:4,7, 12 76:21,24 77:3,16 78:1 79:23 80:6, 23,25 82:5 84:8 85:10,16,17,20 86:8, 17,22 90:12	men 66:7
liability 94:2	makes 11:10	mentorship 83:20 92:4
liaison 49:23 50:11 66:9 73:19	making 66:21 76:25	Meriwether 5:19
license 37:16 41:1 62:21,22		met 17:1 21:13,17 67:20,22
Lily 5:20		method 25:5
limb 55:25		methodology 14:9 24:24
limited 94:1		
limits 42:17		
LinkedIn 51:24 52:2,7,8 61:7		

metrics 45:11	move 72:4 81:17	occurring 82:18
Metro 5:23 7:4,12,15 8:9,11 11:13 14:13 20:11 21:19 23:11 26:13 27:12 34:18 35:1 36:24 37:3,6,8 41:24 42:23 43:23 44:11 50:25 51:14 54:22 55:2,3, 5,8,23 56:6,19 57:25 58:17 59:1,10, 15,20 65:3 66:12 68:6,9,11 70:24 73:17 75:15 77:3,14,21,23 78:11 79:7, 9 80:10 82:14 85:1,2,5,9	moved 28:17	October 19:1 20:10 51:7 52:18 53:17 54:3,6 59:14,19
Metropolitan 81:10	moving 27:7 41:4 76:9 89:18	offenses 43:21
MG000183 26:14	multiple 24:13 25:25 34:23 48:16 71:13 73:10 86:6	offer 28:17,23
MG000202 26:22	mutual 21:4	offered 28:18
Michael 16:21 17:13,14 18:3 20:19 59:24 60:7	<hr/> N <hr/>	office 15:7 50:7,8,9,12,19,25 51:5 55:14 59:19 63:23 71:7,9,12 72:17 73:18 74:16,18 76:25 83:23 88:6,10, 13,15 89:10,17 90:23 93:2
mid 16:9	names 23:18 72:22	officer 15:2,7,9,13 16:1 21:20 26:18 39:21 52:12 63:7 65:4,13 80:9,19,21 82:13 85:3 88:16
mid-april 17:25	narrative 82:4,6,15	onset 15:18
middle 47:22	Nashville 6:19 7:15 36:19 60:25 61:1, 14 80:5 81:10	open 16:4
millimeter 35:20,21 36:8	national 18:5 77:15 78:18 80:2	opening 15:22 16:12
million 71:9,18,25	nature 76:17 93:4	opinion 12:8 78:20,23 79:2,7,8 91:14
mind 79:18 80:3	necessarily 11:18 32:8	opportunities 89:18
minorities 73:23 74:1	needed 31:24 35:8 53:11 64:12 66:21 67:2	opposed 12:18 94:11
minority 68:21	needle 72:4	option 12:16 67:25 89:9
minute 24:19 87:14	negative 74:2	options 7:11 9:18 10:8 13:11 14:19
minutes 64:20	nephew 13:12	order 31:24
misdemeanor 43:3,4,24 44:4	news 77:15 78:18	organization 83:20 92:4
missing 28:25 29:3,5	Nineteen 36:22	organizations 71:3
mistake 88:9	nod 6:9	organizer 73:9
mistaken 62:11	notice 71:22	organizing 18:8 74:11 91:25
MNPS 54:9 55:16 56:2,25 57:2 91:2, 12 93:6,11	November 19:1	outcomes 70:6
modules 84:10	number 18:2 92:17,25 93:2,21,22,23, 24 94:7	outlining 78:22
money 42:21	numbered 26:22 89:1	outreach 49:23
moneys 56:24	numbers 10:18 11:1	outs 44:22
montessori 7:3,14,18,20 9:1,3,7,21, 25 10:2 11:5,23 13:12	<hr/> O <hr/>	oversee 77:5 85:16
montessoris 11:14	oath 9:19 10:17 25:21 45:14,22 46:4 78:23	owed 92:14
month 51:10	Object 46:15	owned 35:24
months 16:5 18:4 32:15 52:14,19 78:18 79:13	objection 29:21 61:9 63:11 89:2	<hr/> P <hr/>
morning 53:9 67:19	obvious 90:9,15,16,18	p.m. 28:16
	occurred 25:4 27:15 41:10 42:15 78:13 88:19	paid 18:10,12 19:7,8 20:16 54:7,12,16 57:4 60:3,6
		panel 23:15,19,23,25 24:22 56:14 94:14

paperwork 39:12 53:10 58:4 59:12 92:17,23	phone 16:19,23 17:20,22 40:21,22	pre-kindergarten 9:4
par 52:4	phonetic 57:21 92:12	premise 10:20,21 15:23 76:13
paragraph 81:15	phrased 39:23	prepare 57:16
paragraphs 81:14	pick 68:5,6,9,24	prepared 58:4
parents 9:9,20 10:15 13:19 14:8 68:10	picked 41:21	preparing 11:6 12:6
part 22:1 24:6 29:14 52:21 56:9 59:17 68:2 83:6 90:20,24	Pippa 5:18	prescribe 86:24
part-time 18:19 65:1	place 14:13 16:16 24:18 37:14 62:19 67:10 70:7,13,20,23,24 71:5 77:20,22 82:20,23 84:2,8	present 52:13,19 53:18 54:3 88:11
parties 48:13	placement 66:19	pretty 52:10 58:5
partnered 67:21	places 10:4 74:8	prevent 83:23
partnering 66:22	plan 77:13 82:11	previous 71:3
partners 67:8	planned 83:1	previously 90:5
partnership 65:2 88:18	planning 65:19 86:19	principals 85:17,22
partnerships 67:9 70:15	plans 86:25	prior 49:8 92:5
party 21:8,10,17,21 47:16 49:9 72:24 73:24 74:4,9 91:6	Player-peters 91:1,21	private 8:9 68:22
passed 10:11	plead 36:25	probation 31:6,7,11,17,19 32:7,8 35:3 47:7
past 21:3 90:4 91:23 92:14	pled 37:21	procedure 14:12
patience 87:12	plethora 66:12	process 7:11 8:16,17 9:18 10:7 12:24 13:1,18,20 14:21,22,25 24:6 27:16 28:8 56:9 58:3 67:23 68:3 71:23 80:17 90:22 92:15
Patrol 41:22	point 34:14 40:12 46:5 47:13,15 72:16 88:14	processes 70:6
pawn 75:8	points 47:16	produced 26:13
pay 53:22 54:17 56:15,17	police 37:6,8,11,13 41:24 62:14	professional 22:1 67:16 75:17
Pearl-cohn 11:13	policies 74:10 93:6,10	profile 61:7
pedagogical 86:14	policy 42:17	program 66:23 67:3
pedagogy 65:19	political 18:7 21:4,18 49:6 72:23 73:2,9,21	programmatic 65:24
people 12:9 22:11 23:16,17 24:16 34:8 76:19 78:16 90:21	politically 21:5	progress 67:11,13
percent 21:16	politics 21:4	Promising 66:23,25 68:2
period 23:15 32:1	position 16:3,7 17:7 26:6 49:20,21 75:19,24,25 80:18 82:14 85:12	promulgated 93:11
person 13:8 17:2 24:16 52:4 64:24 73:1 92:8	possessed 63:5	promulgates 93:6
person's 92:11	possession 36:16 37:1,10,21 38:8, 13 39:11,16,19 42:25 43:5,21,24 44:4 61:25 63:4	proprietorship 53:1
personal 40:15	possibly 19:22 27:13 82:23	provide 11:1,20 46:14 65:19 86:4,7
personally 65:10 85:14 94:11	potentially 63:22	provided 27:12
personnel 93:6	practices 73:7 86:14	public 7:5,18,20 30:3,4 42:22 53:5 55:8 66:12 85:5
Ph.d. 46:18,21,22	pre-employment 28:21	pulled 37:12,25 41:16
phase 86:8		pulling 27:4 37:15

purchased 35:25

push 10:19,21 25:23 73:25

put 8:1 12:18 13:15 27:6,7 31:1,4,5,
11,20 34:22,23 35:3 40:15,18 41:6
44:16 46:9,10 47:6 52:1 53:22 81:8,9,
14 82:1 84:7

Q

quality 78:8

quantify 7:16

quarter 31:14

question 7:13 8:24 11:16,18 12:8,16
13:3,25 19:25 21:15,22,23 27:10 34:9,
10,25 36:24 44:12 69:21 76:13,24
77:2 78:9,10 79:1 81:4 82:12 87:22
89:11

questions 6:5,6 17:17 26:16 29:13
34:16,19 35:1 42:24 43:24 44:2 86:7
87:11,14 89:7 93:15

quick 81:22

R

race 73:1

racial 82:2

ran 33:15 42:6,7

rate 19:9,10,11

re-election 49:13

reaching 63:22 66:24

read 56:3 65:10 81:15,16,19 83:12

reading 65:6 66:6 83:6

ready 27:5

realize 43:20

realm 22:2

reasons 53:19

recall 16:19,21 17:1,9,16 18:1 19:1,13
20:21 22:18,22 23:21 24:3,15 26:7
27:3,18,19 30:15,23,25 31:8,18 35:4,
17,18 36:6,22 37:5 38:2,14,25 39:2,7
42:2,5,6,9,10,18 43:1 44:1,10,11,14,
20,21 45:3 46:17,20 47:5,8,22 48:7,
13,21 59:7 62:6,9,18,23,24 63:6,8,17,
21,22 71:25 72:9 74:21 75:2,5,7,10,
13,21,22,23 76:7 80:4 85:7,8 91:13,15

receive 55:25

received 46:10 55:24 58:21

recently 45:19 71:8 72:22 80:3

recite 22:11

reckless 62:5

recognize 26:12 51:20 87:23

recollection 28:20 35:7 77:18

recommend 83:19

recommendations 85:17,18,20

recommending 86:2,3

reconnect 13:7

record 5:6 6:11 43:16 44:3 53:11
59:23 61:13 63:9 80:7 87:17

recorded 25:7

records 18:13 19:20 20:4,7,8 37:24
39:25

recruit 68:21

recruiter 28:7

red 31:23

redacted 5:18

reflective 86:13

regard 12:13 36:13 68:19,20 69:18
77:24 80:22

registered 35:14,16 36:10 39:5 43:5,
7,8,9,10,25 44:4 92:20,21

registering 66:25

registration 37:16

regularly 66:2

related 33:6 56:2

remember 16:17,25 17:22 19:16
23:7,18 25:8,11,14 31:12 36:11 39:20,
21,23 40:13 61:3 74:15 76:3 77:17

remembering 42:12

repeat 7:13 8:24 13:25 27:10 68:8

rephrase 6:7

report 42:12 46:10 54:24 55:1,4
56:22,23 72:10,11,12 79:11

reported 56:18

reporter 6:10 29:12,17

reports 72:13

represent 5:18,19,20,21 89:8

represents 5:21

research 13:21 14:20

resignation 50:20

respect 86:15

responsible 84:4,5

restructured 88:3

resulted 41:7

resume 34:23 87:25 88:2,25

resumes 34:23 48:20

retake 30:21

retaliation 5:22

return 60:15,18,19

review 28:9

reviewed 28:7

rights 77:8

road 16:20 65:17 67:8 86:21

rob 34:8

robbed 33:13,15,20 34:1

robbers 33:17

robbery 33:12

role 85:6 90:10

roles 90:11

Rolland 5:7 61:19

rooms 86:10

RPS 47:12

Ruby 47:12,18

run 7:9,23 8:13 9:16 15:3,7 66:23

running 8:17

S

salary 19:7,9 56:2 87:2

sale 36:2,3

SATS 12:13

scale 45:20

scandal 74:16	set 83:22	62:17 71:1,14 74:17 78:2,24 79:14,19
Scholars 66:23 67:1 68:2	share 26:8 51:16	speaking 21:14,15 53:20 54:3,13 94:14
school 7:2,3,5,11,17,24 8:15,23 9:7, 9,18 10:9,21,22 11:7,11,23 12:1,6,9, 10,15,19 13:5,12,16,22 14:5,14,19 15:4,8,9,12,17,21,24 30:1,2,3,4,6 31:20,21 44:18 53:24 56:6 64:23 66:20 67:25 68:22 75:20,25 83:11 84:7,24 86:10 91:17	sharing 83:5	specific 10:12 11:1 31:9 67:10 76:2, 18
schools 5:23 7:4,15,18 8:5,6,9,10,11 9:21,25 10:2,3,7,15 11:2,6,7,12,17,20 12:12,25 13:4,18,23 14:3,13 20:11 21:20 22:10,16 23:11 26:13 27:12 34:18 35:1 36:24 37:3 42:23 43:23 44:11 51:14 53:3,5 54:7 55:8,23 56:19 57:25 59:1,10,20 65:3,6,9,20 66:1,5,8, 13 67:17,20 68:6,10,11 70:25 73:12, 15,17 75:15 77:3,14,21,23 78:11 79:8, 10 80:10 82:14,23 83:20 85:5	shark 75:8	specifically 15:24 16:22 24:19 39:20
Scope 23:8	Sharon 22:17 23:5,12,16,24 24:9	specifics 44:10
scores 11:14,19	short 80:8	spectrum 67:17
screen 26:8,9 62:13 81:16	show 27:5 51:16 61:11 67:10,12 75:1 81:6 88:5	speculate 16:18 17:21 29:9
screening 28:22	showing 51:18 87:23	speech 54:17 55:4 56:10 58:9
Scroll 87:24	shows 36:3 61:24	speeding 42:24
searched 37:19	side 27:21 42:7 66:20,24 67:4,24,25 70:3	spelling 57:21 92:12
seat 37:17	silos 77:10	spit 93:13
seats 9:25	simple 58:5	spoke 54:11
secretary 93:1	sit 93:13	spoken 29:18
seeking 10:8	situated 71:7	Sr 74:22
semester 31:15,16	slave 76:21 77:1,4,16 78:1 79:24 80:24 82:5	staff 71:19 90:19
semesters 30:17,19 31:17	small 92:5	stakeholders 67:5
Senate 74:19	smelled 39:22	stamp 27:19
send 10:24 13:22 55:22 56:19,21 92:17,23	social 84:11 86:17	stamped 27:18
sends 55:17	socialization 92:1	stand 31:5
separate 32:22 60:18	socialize 91:20	Stanford 7:3,6,12,14 8:4,12,20 9:1,3 10:7,20 12:18
serve 49:22 65:4	socialized 91:22,24	start 18:23 81:18
served 18:4	sole 52:25	started 18:25 24:8 52:25 53:1 87:6
server 47:20 48:4	solely 23:20 24:8 37:11	starts 27:16
services 86:4	Solutions 52:18,20,23,24 53:6 54:2, 7,15 57:3,11 58:14 59:15,20 60:1,5, 11,14 63:15 94:11	state 5:5 18:5,8 30:9 43:3,18 44:17 48:13 49:9 92:16,20,21,23
serving 72:23	someplace 75:9	state's 93:2
sessions 75:8	son 10:24,25 12:18 14:7 84:12,15,18	stated 56:20
	sort 7:7 34:5 36:12	statement 9:12 45:15,17,22 68:5,12, 15,18
	sound 27:16 28:17	states 43:18 73:10 80:4
	sounds 24:7	status 28:8,13
	South 49:7 73:1	stay 40:4 51:2 56:4 89:9
	southern 18:8	stayed 50:25
	space 18:6 70:1 90:10	staying 88:23
	speak 11:9 12:9 17:24 21:10,25 24:23,24 25:2 37:11 46:12 56:8 61:4	Steiner 5:4,15 6:3 29:23 46:16 61:6, 10 63:9,13 87:11,21 88:25 93:19

94:16		
step 28:9,17 77:5	T	thinking 22:5 32:2 37:23 83:8 87:3
stepped 79:9	taillight 37:13 38:1	thought 10:25 13:13,24 14:6 56:9
stepping 82:13	taking 54:22 82:20 84:2 92:15	thoughts 91:14
steps 70:2	talk 25:3 66:14 67:12,13 86:23 91:11	thousand 20:1 56:16 57:4,10 58:6 59:11
stipulate 63:7	talked 64:25 72:3	Thursday 68:1
stop 6:8 27:8 51:16 80:8	talking 62:23 92:16	time 8:14 13:19 14:1,23 15:10 16:20, 21 17:2,13,23 18:1 20:16,22 21:11 22:9,10,12 23:15 27:18,19 31:21 32:1, 9,12 33:15 34:14 36:23 39:8,17,18 40:1,4,12 41:20 43:16 44:19,22 47:13, 14,16,25 48:11 49:10,12 50:2,6,20 52:3 54:8 55:15 56:1,14,22 59:6,7 60:1 62:19 69:11 73:4,16,17,19 74:9 79:15,16,18,19 80:5 83:5,12 88:14 91:5
stopped 82:17	Taneka 57:21 92:11	timeline 18:2
story 80:2	taught 77:15,25 81:7 82:15 83:13,22 85:23,25 86:3	title 84:20 88:17
strengths 64:15	tax 18:13 53:11,20 55:15 60:15,16 92:11	TNDP 73:5
stride 76:9	taxes 55:1,10 56:1 57:8,14,16 92:8,13	today 6:5 9:19 10:17 14:14 25:21 29:12,17 34:11,17 45:14 61:17 62:1 79:5 83:13
strip 41:12	teach 84:4 85:19,21 87:1	today's 14:14 59:9
structures 49:24	teacher 69:14 80:23 83:21	told 17:9 35:6 44:5,7 72:8 77:24 78:3, 19,21,25 80:20,22
stuck 22:13	teachers 56:12 67:7 70:11 84:3 85:18,20,22 86:7,8	Tony 32:21 33:4,10
student 69:3,7 70:5,13 80:23 86:23	teaching 67:21 76:20 77:3 80:23 84:10	top 8:7 11:25 12:15 16:17,19 22:5 23:22 24:3 25:14 26:11,17 28:17 30:15,25 42:2 48:21 59:8 75:5 77:11
students 66:4 68:20,21,25 69:18 70:1,8,11,17,20 84:6,9 86:16	team 7:10 9:17 11:19 14:20,23 18:5 20:9 63:24 65:1 68:1,2 86:17,18 90:22	total 39:1
studies 86:18	teams 90:24	tough 64:8 82:7
study 88:18	technical 5:24	town 16:24
stuff 48:13 53:20 81:16	telephone 25:4	track 29:6
successful 70:5	telling 10:17 23:14 45:14 46:17,20 75:23 76:3 80:13 82:10	traffic 41:4
sued 75:7	ten 52:13	training 65:19 67:6 86:20
suffers 84:15	Tennessee 6:19 30:9 41:21 44:17 47:16 61:14 72:23 81:11 92:22	trainings 56:13
summer 67:2,6	term 15:14 17:22	transcripts 30:16
supervise 9:17 64:25 65:15	terms 12:6 15:3 53:24 73:22	transitioning 16:6
supervised 7:10	testified 5:2,10 24:25	trial 6:11
supervising 14:23	testimony 24:2	true 13:23,25 14:2 25:21
supervisor 60:21,22	testing 12:11	truthful 20:14
support 65:6,9 66:2,5 67:7	theory 37:14	TSU 30:10 31:2,7,14 32:1 34:17,18
supposed 58:18	thing 6:8 36:2,3 50:13 53:25 54:14 63:3 76:16,18 79:6 81:23	
supposedly 27:14	things 32:9,11 40:15 48:14 50:15 55:2,11 57:7 66:12,24 67:4 69:25 70:19 71:24 76:20 82:20 83:4 84:8,11 93:3	
surprise 76:5,6,17		
suspended 47:6 62:21		
sworn 5:2		
system 12:23 13:10,14,15 14:25 31:15 45:24 56:18		
systems 71:2		

35:1 37:6 45:1,7,11,19 46:6 47:9,17,
21 48:9,11

Tuesday 47:12,18 67:18 68:1

turned 24:9

two-plus 20:7

type 34:23 35:19 54:10 66:6 75:17
77:12 86:3

typing 43:14

U

U.S. 74:19

uh-huh 6:8

undergrad 30:11

underneath 37:17

understand 6:6 10:10 12:23,24
13:10,15 14:20,24 74:11 76:19 80:6
81:3 86:9,21

understanding 15:6 34:12 75:19
76:4 84:10

unethical 53:24

union 50:1,5 73:9

unions 50:10,12 91:6

United 43:18

universities 45:23

University 30:9 44:17

unlawful 63:4

unlawfully 63:5

upcoming 17:7 55:9 67:6 68:4

updates 53:11

uploaded 92:13

utilize 74:6

V

vaguely 93:12

values 70:18

vehicle 37:19 38:21,24 41:25 42:4,8,
13 86:12

vehicles 42:10

verbatim 39:25 93:13

verify 19:20 24:17 45:11

versus 11:13 81:9

vetted 90:8 91:15

vetting 90:22

Victoria 6:16

violation 36:13 56:24 84:20

violations 41:4

violence 32:13,15,20 34:5

Virginia 49:11

vision 90:25

voice 70:13,15

voices 74:7

vote 73:23 74:3

W

W-9 58:12

W-I-N-D-W-O-O-D 6:18

W2 59:7

waiting 92:18

walk 14:21

wanted 13:18,22 14:5 26:5 53:20,22
64:5 82:17 89:10,16 90:2,3,9,12

Waverly 77:15 81:15 82:16 83:7,13

wealth 86:15

weapon 35:11,19 36:16 37:10,22
43:5,7,25 44:5 63:4

week 18:22 19:2,4 53:8,9 66:14,16,18
67:13,15,22 68:4 71:15 83:22 84:1

weeks 84:22

Wheeler 60:23

Whites 11:7,13

wife 8:3,8 12:17,24 13:7 14:2

wife's 6:15

Willie 81:24 82:4,8,14

win 51:3 74:18

Windwood 6:18 40:16

word 74:1

work 18:5,22 20:10,11,15,18 21:19
47:10,24 48:6 49:18,22 50:17,24 51:8
53:2 54:8 55:3 56:12 61:1 65:5,18,23,
24 66:4,9 67:8 69:6,8 70:12,14 71:16
73:7,8 74:12 75:15 76:9,17 79:21 84:7
86:8,11,12,16 89:15,25 90:13 91:11
92:3

worked 20:22 47:12,13,14,15,19
50:18,19 51:13 54:6 64:15 65:21
73:18,20 74:9,24

working 16:20 17:5,10,11 18:23,25
19:2,5,23 48:12 49:8,9,10,11 50:1,2,4,
5,7,25 51:11 52:4,20,22 53:3,4,9 54:6
59:23,24 67:4,21 70:12 71:4,5 72:24,
25 73:3,4,5,6,8 74:2 83:10 84:1 86:22
88:5 90:4 91:2,5,6

wreck 38:19 41:7,10,17

writing 81:9

wrong 23:24 33:16 54:22 60:9 69:4,5
73:22 74:14 89:23 92:9

wrote 43:11

Y

year 7:1,22 30:5 33:2,4 44:18 49:8
50:21 52:13 55:15 56:23 58:11 77:22
88:1 92:14

years 20:7 21:3,17 30:10 31:11 32:3,5
44:21 48:7 50:17 52:19 62:24 64:9
73:5 75:21 91:7,23 92:2

young 6:25 33:11 57:20 65:7 66:7

Z

zip 6:20

zoned 11:23 12:1,19 13:6

Zoom 25:4,6